Mabbett & Associates, Inc.
Environmental Consultants & Engineers
A SERVICE DISABLED VETERAN OWNED SMALL BUSINESS

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January 6, 2010

Mr. Don Heller
United States Environmental Protection Agency
Region V
77 West Jackson Boulevard
Chicago, IL 60604-3590

Re: PCB Action Work Plan Amendment
Bodycote Thermal Processing Inc.,
Melrose Park, IL
ILD 005 071 808
Project No. 1998002.267

Dear Mr. Heller:

Mabbett and Associates, Inc. ("M&A") submits this request for modification of the Polychlorinated Bi-phenyl Work Plan (PCB Work Plan) for the Heat Treatment Building (HTB) located at the above referenced property on behalf of our client Bodycote Thermal Processing, Inc., ("Bodycote"). The PCB Work Plan was originally submitted to Region V U.S. Environmental Protection Agency (the Agency) on September 12, 2006.

Groundwater Monitoring Program

Semi-annual groundwater monitoring at key monitoring wells has been conducted in the HTB for the past four (4) years. As stated in the existing PCB Work Plan, groundwater monitoring is to be conducted until free product has been removed to the maximum extent practicable and residual PCB concentrations in groundwater meet the established GRO. According to the conditionally approved PCB Work Plan, M&A is required to sample twenty-two (22) groundwater monitoring wells.

Until the October 2009 monitoring event, the groundwater monitoring wells included in the semi-annual program consisted of MCA-2, MCA-5, M&A-104, M&A-105, M&A-106, M&A-110, M&A-111, M&A-112, M&A-113, M&A-114, M&A-115, M&A-117, M&A-120, M&A-121, M&A-122, M&A-124, M&A-126, M&A-130, M&A-131, M&A-133, M&A-301, and M&A-208. Due to a new furnace line installation in December 2008 groundwater monitoring well M&A-105 was closed in place.

Due to the nature and aerial extent of the contamination, M&A has collected an additional ten (10) to twelve (12) groundwater samples from various wells located in the HTB from time to

time in order to confirm the representative Conceptual Site Model that includes limited migration of PCBs away from the NAPL source area. Figure L-1 depicts the groundwater monitoring wells sampled during our most recent extended sampling program in October 2008. Groundwater monitoring wells shown in red indicate that PCBs were detected at concentrations above the Illinois Environmental Protection Agency (IEPA) applicable GRO of 2.5 micrograms per liter (µg/L) whereas groundwater monitoring wells shown in green indicate that PCBs were not detected at concentrations above the applicable GRO.

Most of the wells in the semi-annual monitoring program have been below the GRO since the monitoring program was established in 2006. The semi-annual data collected in accordance with the PCB Work Plan demonstrate that concentrations of PCBs remain steady or are decreasing. Therefore, in our professional opinion twenty-two (22) wells are no longer needed to monitor the PCB plume and fewer wells can be used to track the concentration of PCBs in groundwater beneath the HTB. As seen in Figure L-2, the Currently Approved Groundwater Monitoring Program, only one groundwater monitoring well M&A-113 which currently serves as the DNAPL recovery well, currently exceeds the PCB GRO.

M&A thus proposes to remove groundwater monitoring wells MCA-2, M&A-105, M&A-106, M&A-115, M&A-117, M&A-120, M&A-130, M&A-131, M&A-133, and M&A-208 from the semi-annual groundwater monitoring program. The groundwater monitoring wells chosen to remain in the program are wells upgradient and downgradient of NAPL recovery wells M&A-113 and M&A-114, and wells where dissolved PCBs have been detected in prior monitoring events. Refer to the historical data presented on the attached Table 1 – Historical Groundwater Analytical Data Summary. As seen on Table 1, the groundwater monitoring well that continues to exceed the GRO of 2.5 µg/L for PCBs is the DNAPL recovery well, M&A-113.

M&A will monitor the distribution of PCBs in intermediate depth groundwater by sampling on a semi annual; basis intermediate depth wells M&A-110, M&A-111, M&A-113, M&A-121, M&A-122, and M&A-126 until residual PCB concentrations in intermediate groundwater meet the established GRO. See Table 2 below.

M&A will monitor the distribution of PCBs in shallow groundwater by sampling on a semi annual; basis shallow depth wells MCA-5, M&A-104, M&A-112, M&A-114, M&A-116, M&A-124, and M&A-301 until residual PCB concentrations in shallow groundwater meet the established GRO. See Table 2 below.

Well Identification	Current Groundwater Monitoring Wells	Proposed Groundwater Monitoring Wells
MCA-2 (S)	PCBs	-
MCA-5 (S)	PCBs	PCBs
M&A-104 (S)	PCBs	PCBs
M&A-105 (S)	PCBs	-
M&A-106 (S)	PCBs	-
M&A-110 (I)	PCBs	PCBs

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Well Identification	Current Groundwater Monitoring Wells	Proposed Groundwater Monitoring Wells
M&A-111 (I)	PCBs	PCBs
M&A-112 (S)	PCBs	PCBs
M&A-113 (I)	PCBs	PCBs
M&A-114 (S)	PCBs	PCBs
M&A-115 (I)	PCBs	-
M&A-116 (S)	-	PCBs
M&A-117 (I)	PCBs	-
M&A-120 (I)	PCBs	-
M&A-121 (I)	PCBs	PCBs
M&A-122 (I)	PCBs	PCBs
M&A-124 (S)	PCBs	PCBs
M&A-126 (I)	PCBs	PCBs
M&A-130 (S)	PCBs	-
M&A-131 (I)	PCBs	-
M&A-133 (I)	PCBs	-
M&A-301 (S)	PCBs	PCBs
M&A-208 (S)	PCBs	-

NOTES: (I) = intermediate groundwater monitoring well
(S) = shallow groundwater monitoring well

TABLE 2: Current groundwater monitoring wells sampled during the semi-annual groundwater sampling event and proposed groundwater monitoring wells to be sampled during future semi-annual groundwater sampling events.

Groundwater samples will be collected and analyzed using the same methods as the existing program. Wells containing NAPL, such as groundwater monitoring wells M&A-113 and M&A-114, may not be sampled if an adequate volume of groundwater is not present in the well at the time of the semi-annual sampling event. M&A personnel utilize the EPA document *Low Stress (low flow) Purging and Sampling Procedure for the Collection of Groundwater Samples from Monitoring Wells,* dated July 30, 1996. M&A will purge each well by using a variable speed peristaltic pump to control the rate of purging and limit the drawdown caused by this operation. Dedicated $^{3}/_{8}$-inch outer diameter polyethylene tubing installed in each of the wells will be utilized as the intake and discharge tubing for the pumps. Pharmaceutical-grade tubing will be utilized in the pump head and was connected to the intake and discharge tubing (by insertion) to prevent the introduction of air into the samples. M&A will purge groundwater until the following field parameters generally stabilize to within the ranges presented:

Field Parameter	Stabilization Criteria
Specific Conductivity	3% of range
Oxidation-Reduction Potential	10.0 millivolts (mV)
Dissolved Oxygen	10% of range
pH	0.10 Standard pH Units

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Temperature	0.2°C
Turbidity	10% of range

Following an initial purge period, measurements for these field parameters will be collected and recorded approximately every 3 to 5 minutes. In general, when all field parameters have stabilized for three consecutive measurements, the purging process will be terminated and the well will be prepared for sampling.

The sampling methodology involves running the peristaltic pump so that groundwater samples can be collected through the dedicated tubing. The samples will be collected in laboratory-supplied glassware, stored in an iced cooler, and submitted under chain-of-custody procedures to an approved commercial analytical laboratory for PCBs using EPA Method 8082.

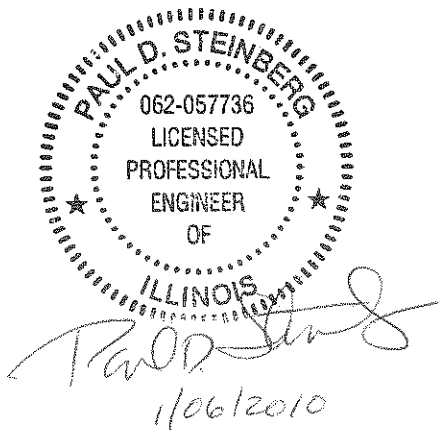
If you have any further questions, please write or call me or my associates James R. Greacen or Christopher L. Mabbett on 781-275-6050.

Very truly yours,

MABBETT & ASSOCIATES, INC.

BY

Paul D. Steinberg, P.E., LSP
Licensed Professional Engineer No. 062.057736
Expires 11/30/2011



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Enclosures:
1. Table 1 – Historical Groundwater Analytical Data Summary
2. Figure L-1 – Extended Groundwater Monitoring Program
3. Figure L-2 – Currently Approved Groundwater Monitoring Program

cc: Paula Stine, IEPA
Mr. Thomas Anderson, Bodycote
ANM, JRG, CLM (MF)

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TABLE 1
BODYCOTE THERMAL PROCESSING
HEAT TREATMENT BUILDING
SUMMARY OF GROUNDWATER POLYCHLORINATED BIPHENYL LABORATORY ANALYTICAL RESULTS

GW Samples			Aroclor 1016	Aroclor 1221	Aroclor 1232	Aroclor 1242	Aroclor 1248	Aroclor 1254	Aroclor 1260
TACO Tier I GRO			2.5	2.5	2.5	2.5	2.5	2.5	2.5
WELL	AQUIFER	DATE	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)
MW-6	Shallow	10/28/2008	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
MW-10	Intermed	10/28/2008	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
MCA-1	Shallow	10/28/2008	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		4/7/2009	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		10/20/2009	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
MCA-2	Shallow	10/02/2002	BRL (<0.5)	BRL (<1.0)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		10/23/2003	BRL (<0.5)	BRL (<1.0)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		4/18/2006	BRL (<1.0)	BRL (<1.0)	BRL (<1.0)	BRL (<1.0)	BRL (<1.0)	BRL (<1.0)	BRL (<1.0)
		10/19/2006	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		5/02/2007	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		10/17/2007	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		4/16/2008	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		10/23/2008	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		4/07/2009	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		10/20/2009	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
MCA-3	Shallow	4/07/2009	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
MCA-4	Shallow	10/28/2008	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
MCA-5	Shallow	5/18/2004	BRL (<0.5)	BRL (<1.0)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		4/17/2006 [2]	-	-	-	-	-	-	-
		5/15/2006	BRL (<0.4)	BRL (<0.4)	BRL (<0.4)	BRL (<0.4)	BRL (<0.4)	BRL (<0.4)	BRL (<0.4)
		10/18/2006	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		4/30/2007 [2]	-	-	-	-	-	-	-
		10/17/2007	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		10/22/2008	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		4/07/2009	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		10/20/2009	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
M&A-101	Shallow	10/29/2008	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
M&A-103	Shallow	5/18/2004	BRL (<0.5)	BRL (<1.0)	BRL (<0.5)	BRL (<0.5)	4.99	BRL (<0.5)	BRL (<0.5)
		4/17/2006	BRL (<1.0)	BRL (<1.0)	BRL (<1.0)	BRL (<1.0)	BRL (<1.0)	BRL (<1.0)	BRL (<1.0)
		10/19/2006	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		4/30/2007	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		10/17/2007	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		4/16/2008	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		10/23/2008	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)

TABLE 1
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SUMMARY OF GROUNDWATER POLYCHLORINATED BIPHENYL LABORATORY ANALYTICAL RESULTS

GW Samples			Aroclor 1016	Aroclor 1221	Aroclor 1232	Aroclor 1242	Aroclor 1248	Aroclor 1254	Aroclor 1260
TACO Tier I GRO			2.5	2.5	2.5	2.5	2.5	2.5	2.5
WELL	AQUIFER	DATE	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)
M&A-104	Shallow	10/02/2002	BRL (<0.5)	BRL (<1.0)	BRL (<0.5)	**1.6**	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		10/23/2003	BRL (<0.5)	BRL (<1.0)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		5/18/2004	BRL (<0.5)	BRL (<1.0)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		4/17/2006	BRL (<1.0)	BRL (<1.0)	BRL (<1.0)	BRL (<1.0)	BRL (<1.0)	BRL (<1.0)	BRL (<1.0)
		10/19/2006	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		4/30/2007	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		10/17/2007	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		4/16/2008	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		10/23/2008	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	**0.592**	BRL (<0.5)	BRL (<0.5)
		12/17/2008	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		4/07/2009	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		10/21/2009	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	**0.716**	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
M&A-105	Shallow	10/02/2002	BRL (<0.5)	BRL (<1.0)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		10/22/2003	BRL (<0.5)	BRL (<1.0)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		4/19/2006	BRL (<1.0)	BRL (<1.0)	BRL (<1.0)	BRL (<1.0)	BRL (<1.0)	BRL (<1.0)	BRL (<1.0)
		10/19/2006	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		5/2/2007 [4]	-	-	-	-	-	-	-
		10/17/2007 [4]	-	-	-	-	-	-	-
		4/16/2008 [4]	-	-	-	-	-	-	-
		10/22/2008 [4]	-	-	-	-	-	-	-
M&A-106	Shallow	5/15/2006	BRL (<0.4)	BRL (<0.4)	BRL (<0.4)	BRL (<0.4)	BRL (<0.4)	BRL (<0.4)	BRL (<0.4)
		10/19/2006	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		5/01/2007	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		10/18/2007	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		4/16/2008	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		10/22/2008	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		4/07/2009	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		10/20/2009	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
M&A-109	Deep	5/18/2004	BRL (<0.5)	BRL (<1.0)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		4/17/2006 [1]	-	-	-	-	-	-	-
		10/19/2006 [1]	-	-	-	-	-	-	-
		5/2/2007 [1]	-	-	-	-	-	-	-
		10/17/2007 [1]	-	-	-	-	-	-	-
		10/22/2008 [1]	-	-	-	-	-	-	-
M&A-110	Intermed	5/18/2004	BRL (<0.5)	BRL (<1.0)	BRL (<0.5)	BRL (<0.5)	**12.2**	BRL (<0.5)	BRL (<0.5)
		4/17/2006 [1]	-	-	-	-	-	-	-
		5/15/2006	BRL (<0.4)	BRL (<0.4)	BRL (<0.4)	**5.92**	BRL (<0.4)	BRL (<0.4)	BRL (<0.4)
		10/19/2006	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	**1.31**	BRL (<0.5)	BRL (<0.5)
		4/30/2007	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		10/17/2007	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	**1.11**	BRL (<0.5)	BRL (<0.5)
		10/23/2008	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	**0.848**	BRL (<0.5)	BRL (<0.5)
		4/07/2009	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		10/21/2009	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	0.508	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)

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SUMMARY OF GROUNDWATER POLYCHLORINATED BIPHENYL LABORATORY ANALYTICAL RESULTS

GW Samples			Aroclor 1016	Aroclor 1221	Aroclor 1232	Aroclor 1242	Aroclor 1248	Aroclor 1254	Aroclor 1260
TACO Tier I GRO			2.5	2.5	2.5	2.5	2.5	2.5	2.5
WELL	AQUIFER	DATE	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)
M&A-111	Intermed	10/02/2002	BRL (<25)	BRL (<50)	BRL (<25)	**600**	BRL (<25)	**154**	BRL (<25)
		10/23/2003	BRL (<0.5)	BRL (<1.0)	BRL (<0.5)	BRL (<0.5)	**3.73**	BRL (<0.5)	BRL (<0.5)
		5/18/2004	BRL (<0.5)	BRL (<1.0)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		4/18/2006	BRL (<1.0)	BRL (<1.0)	BRL (<1.0)	BRL (<1.0)	BRL (<1.0)	BRL (<1.0)	BRL (<1.0)
		10/19/2006	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		4/30/2007	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		10/18/2007	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	**0.652**	BRL (<0.5)	BRL (<0.5)
		4/16/2008	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		10/22/2008	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	**1.16**	BRL (<0.5)	-
		12/17/2008	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		4/07/2009	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		10/21/2009	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	**0.712**	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
M&A-112	Shallow	10/02/2002	BRL (<0.5)	BRL (<1.0)	BRL (<0.5)	**5.9**	BRL (<0.5)	**2.8**	BRL (<0.5)
		10/23/2003	BRL (<1.0)	BRL (<2.0)	BRL (<1.0)	BRL (<1.0)	**17.7**	**9.04**	BRL (<1.0)
		5/18/2004	BRL (<0.5)	BRL (<1.0)	BRL (<0.5)	BRL (<0.5)	**13.3**	BRL (<0.5)	BRL (<0.5)
		4/18/2006	BRL (<1.0)	BRL (<1.0)	BRL (<1.0)	BRL (<1.0)	BRL (<1.0)	BRL (<1.0)	BRL (<1.0)
		10/19/2006[2]	-	-	-	-	-	-	-
		5/01/2007	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		10/18/2007	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	**1.99**	BRL (<0.5)	BRL (<0.5)
		4/16/2008	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		10/23/2008	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	**1.02**	BRL (<0.5)	BRL (<0.5)
		4/07/2009	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	**1.39**	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		10/21/2009	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	**1.04**	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
M&A-113	Intermed	5/18/2004	BRL (<0.5)	BRL (<1.0)	BRL (<0.5)	BRL (<0.5)	**15.8**	BRL (<0.5)	BRL (<0.5)
		4/19/2006	BRL (<1.0)	BRL (<1.0)	BRL (<1.0)	**16.3**	BRL (<1.0)	BRL (<1.0)	BRL (<1.0)
		10/19/2006	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	**1.22**	BRL (<0.5)	BRL (<0.5)
		5/01/2007	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		10/17/2007[2]	-	-	-	-	-	-	-
		10/23/2008	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	**5.28**	BRL (<0.5)	BRL (<0.5)
		12/17/2008	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	**1.29**	BRL (<0.5)	BRL (<0.5)
		4/07/2009	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	**2.96**	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		10/21/2009	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	**112**	BRL (<0.5)	BRL (<0.5)

TABLE 1
BODYCOTE THERMAL PROCESSING
HEAT TREATMENT BUILDING
SUMMARY OF GROUNDWATER POLYCHLORINATED BIPHENYL LABORATORY ANALYTICAL RESULTS

GW Samples			Aroclor 1016	Aroclor 1221	Aroclor 1232	Aroclor 1242	Aroclor 1248	Aroclor 1254	Aroclor 1260
TACO Tier I GRO			2.5	2.5	2.5	2.5	2.5	2.5	2.5
WELL	AQUIFER	DATE	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)
M&A-114	Shallow	10/02/2002	BRL (<0.5)	BRL (<1.0)	BRL (<0.5)	16.8	BRL (<0.5)	13.8	BRL (<0.5)
		4/17/2006 [3]	-	-	-	-	-	-	-
		10/19/2006 [3]	-	-	-	-	-	-	-
		5/2/2007 [3]	-	-	-	-	-	-	-
		10/17/2007 [3]	-	-	-	-	-	-	-
		10/22/2008 [3]	-	-	-	-	-	-	-
		10/20/2009	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
M&A-115	Intermed	10/02/2002	BRL (<0.5)	BRL (<1.0)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		10/23/2003	BRL (<0.5)	BRL (<1.0)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		4/19/2006	BRL (<1.0)	BRL (<1.0)	BRL (<1.0)	BRL (<1.0)	BRL (<1.0)	BRL (<1.0)	BRL (<1.0)
		10/19/2006	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		5/2/2007 [1]	-	-	-	-	-	-	-
		10/18/2007	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		4/08/2009	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		10/20/2009	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
M&A-116	Shallow	5/18/2004	BRL (<0.5)	BRL (<1.0)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		4/18/2006	BRL (<1.0)	BRL (<1.0)	BRL (<1.0)	BRL (<1.0)	BRL (<1.0)	BRL (<1.0)	BRL (<1.0)
		5/15/2006	BRL (<0.4)	BRL (<0.4)	BRL (<0.4)	BRL (<0.4)	BRL (<0.4)	BRL (<0.4)	BRL (<0.4)
		10/18/2006	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		5/01/2007	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		10/17/2007 [2]	-	-	-	-	-	-	-
		10/22/2008 [2]	-	-	-	-	-	-	-
M&A-117	Intermed	5/01/2007	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		10/17/2007	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		4/16/2008	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		10/22/2008	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		4/06/2009	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		10/20/2009	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
M&A-118	Shallow	10/28/2008	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)

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GW Samples			Aroclor 1016	Aroclor 1221	Aroclor 1232	Aroclor 1242	Aroclor 1248	Aroclor 1254	Aroclor 1260
TACO Tier I GRO			2.5	2.5	2.5	2.5	2.5	2.5	2.5
WELL	AQUIFER	DATE	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)
M&A-119	Intermed	5/18/2004	BRL (<0.5)	BRL (<1.0)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		4/18/2006	BRL (<1.0)	BRL (<1.0)	BRL (<1.0)	BRL (<1.0)	BRL (<1.0)	BRL (<1.0)	BRL (<1.0)
		10/18/2006	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		4/30/2007	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		10/18/2007	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
M&A-120	Intermed	10/18/2006	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		5/01/2007	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		10/17/2007[2]	-	-	-	-	-	-	-
		10/22/2008[2]	-	-	-	-	-	-	-
		12/17/2008	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		4/06/2009	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		10/20/2009	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
M&A-121	Intermed	5/18/2004	BRL (<0.5)	BRL (<1.0)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		4/18/2006	BRL (<1.0)	BRL (<1.0)	BRL (<1.0)	BRL (<1.0)	BRL (<1.0)	BRL (<1.0)	BRL (<1.0)
		10/18/2006	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		5/02/2007	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		10/17/2007[2]	-	-	-	-	-	-	-
		10/22/2008[2]	-	-	-	-	-	-	-
		12/17/2008	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		4/07/2009	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		10/20/2009	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
M&A-122	Intermed	5/18/2004	BRL (<0.5)	BRL (<1.0)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		4/19/2006	BRL (<1.0)	BRL (<1.0)	BRL (<1.0)	BRL (<1.0)	BRL (<1.0)	BRL (<1.0)	BRL (<1.0)
		10/18/2006	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		5/02/2007	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		10/17/2007	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		4/16/2008	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		10/22/2008	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		4/09/2009	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		10/20/2009	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)

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GW Samples			Aroclor 1016	Aroclor 1221	Aroclor 1232	Aroclor 1242	Aroclor 1248	Aroclor 1254	Aroclor 1260
TACO Tier I GRO			2.5	2.5	2.5	2.5	2.5	2.5	2.5
WELL	AQUIFER	DATE	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)
M&A-124	Shallow	5/15/2006	BRL (<0.4)	BRL (<0.4)	BRL (<0.4)	BRL (<0.4)	BRL (<0.4)	BRL (<0.4)	BRL (<0.4)
		10/19/2006	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		5/01/2007	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		10/18/2007	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		4/16/2008	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		10/22/2008	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		4/07/2009	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		10/20/2009	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
M&A-126	Intermed	5/18/2004	BRL (<0.5)	BRL (<1.0)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		4/18/2006	BRL (<1.0)	BRL (<1.0)	BRL (<1.0)	BRL (<1.0)	BRL (<1.0)	BRL (<1.0)	BRL (<1.0)
		10/18/2006	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		4/30/2007	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		10/18/2007	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		4/16/2008	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		10/23/2008	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		4/07/2009	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		10/20/2009	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
M&A-127	Intermed	10/28/2008	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
M&A-130	Shallow	4/16/2008	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		10/29/2008	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		4/09/2009	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		10/20/2009	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
M&A-131	Intermed	12/19/2006	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		10/29/2008	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		4/09/2009	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		10/20/2009	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
M&A-133	Intermed	12/19/2006	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		10/28/2008	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		4/07/2009	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		10/20/2009	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)

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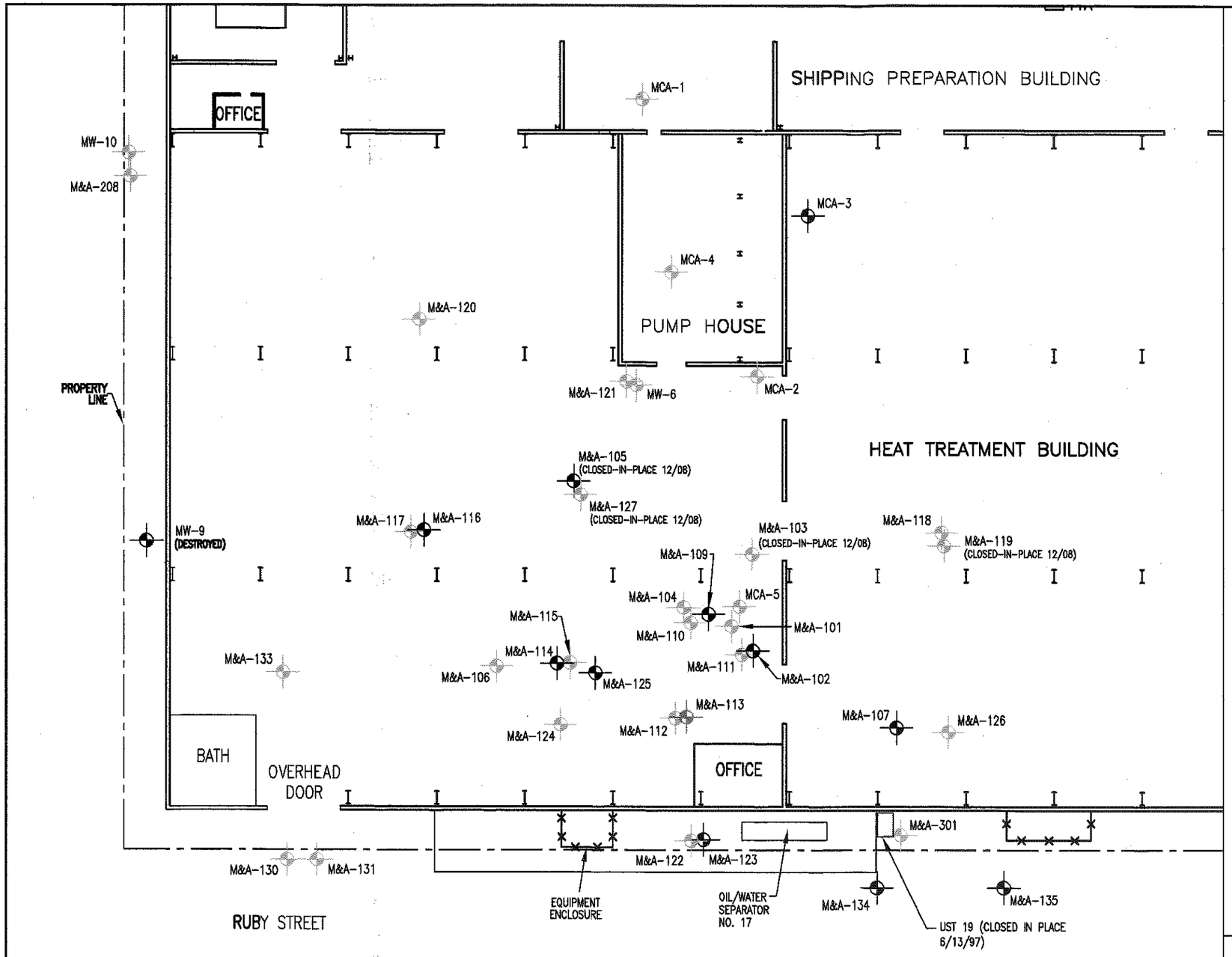
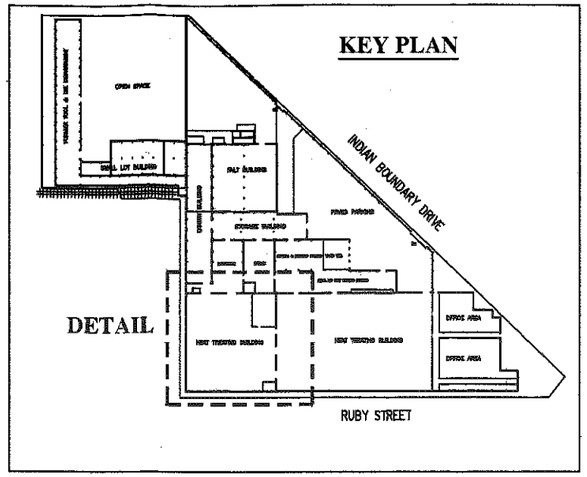
GW Samples			Aroclor 1016	Aroclor 1221	Aroclor 1232	Aroclor 1242	Aroclor 1248	Aroclor 1254	Aroclor 1260
TACO Tier I GRO			2.5	2.5	2.5	2.5	2.5	2.5	2.5
WELL	AQUIFER	DATE	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)	(µg/L)
M&A-301	Shallow	4/19/2006	BRL (<1.0)	BRL (<1.0)	BRL (<1.0)	BRL (<1.0)	BRL (<1.0)	BRL (<1.0)	BRL (<1.0)
		10/18/2006	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		5/02/2007	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		10/17/2007	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		4/16/2008	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		10/22/2008	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		4/09/2009	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		10/20/2009	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
M&A-208	Intermed	10/18/2006	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		4/30/2007[2]	-	-	-	-	-	-	-
		10/17/2007[2]	-	-	-	-	-	-	-
		10/28/2008	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		4/9/2009	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)
		10/20/2009	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)	BRL (<0.5)

Notes:
µg/L - micrograms per liter
PCBs analysis performed via EPA Method 8082
TACO - Tiered Approach Toward Corrective Action
TACO Tier I Standards based on the Illinois Environmental Protection Agency Title 35. Admin Code 742.505
Tier 1 Remediation Objectives for Class II Groundwater
Shading indicates compound exceeds established TACO Tier I standard.
BOLD values indicate compound was detected
(1) Not sampled, well was dry.
(2) Not sampled, insufficient water recharge to complete sampling.
(3) Not sampled, well contained no water, only Free Product
(4) Not sampled, obstruction in well.





NOTES:

1. MONITORING WELL LOCATIONS INSTALLED PRIOR TO 1997 ARE BASED ON FIELD MEASUREMENTS TAKEN BY M&A PERSONNEL.
2. MONITORING WELL LOCATIONS INSTALLED DURING AND AFTER 1997 ARE BASED ON FIELD MEASUREMENTS TAKEN BY AN ILLINOIS REGISTERED LAND SURVEYOR.

LEGEND:

- MONITORING WELL LOCATION
- PCB GRO NON-EXCEEDANCE
- PCB GRO EXCEEDANCE
- APPROXIMATE PROPERTY LINE
- SUPPORTING COLUMN
- CHAIN LINK FENCE

SCALE:

0' 30' 60' 90'

BODYCOTE THERMAL PROCESSING, INC.

MELROSE PARK, ILLINOIS

NO.	DATE	DESCRIPTION REVISION	DRN	CHK	APP

Mabbett & Associates

HEAT TREATMENT BUILDING EXTENDED GROUNDWATER MONITORING PROGRAM (OCTOBER 2008)

DWG. NO. L-1

DRAWN DJA | APPROVED | SCALE 1"=30'-0" | PROJ. NO. 1998002.267

S:\CADD\WORK\Bodycote\RAP Modification-267-268\1998002-267 L1 HTB Extended GW Sampling Event.dwg - L-1 Well Loc Plan - Dec. 09, 2009 3:41pm - dja

SHIPPING PREPARATION BUILDING

OFFICE

MCA-1

MW-10

M&A-208

MCA-3

MCA-4

M&A-120

PUMP HOUSE

PROPERTY LINE

M&A-121

MW-6

MCA-2

HEAT TREATMENT BUILDING

M&A-105
(CLOSED-IN-PLACE 12/08)

M&A-127
(CLOSED-IN-PLACE 12/08)

M&A-117

M&A-116

MW-9
(DESTROYED)

M&A-103
(CLOSED-IN-PLACE 12/08)

M&A-118

M&A-119
(CLOSED-IN-PLACE 12/08)

M&A-109

M&A-104

MCA-5

M&A-115

M&A-110

M&A-101

M&A-114

M&A-133

M&A-106

M&A-125

M&A-111

M&A-102

M&A-113

M&A-124

M&A-112

M&A-107

M&A-126

BATH

OVERHEAD DOOR

OFFICE

M&A-301

M&A-130

M&A-131

M&A-122

M&A-123

EQUIPMENT ENCLOSURE

OIL/WATER SEPARATOR NO. 17

M&A-134

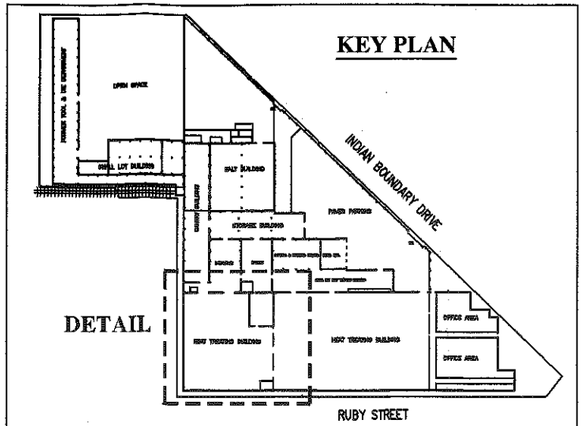
M&A-135

UST 19 (CLOSED IN PLACE 6/13/97)

RUBY STREET

N

KEY PLAN



NOTES:

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2. MONITORING WELL LOCATIONS INSTALLED DURING AND AFTER 1997 ARE BASED ON FIELD MEASUREMENTS TAKEN BY AN ILLINOIS REGISTERED LAND SURVEYOR.

LEGEND:

- MONITORING WELL LOCATION
- PCB GRO NON-EXCEEDANCE
- PCB GRO EXCEEDANCE
- APPROXIMATE PROPERTY LINE
- SUPPORTING COLUMN
- CHAIN LINK FENCE

SCALE:

0' 30' 60' 90'

BODYCOTE THERMAL PROCESSING, INC.

MELROSE PARK, ILLINOIS

NO.	DATE	DESCRIPTION	DRN	CHK	APP
		REVISION			

Mabbett & Associates

HEAT TREATMENT BUILDING
EPA CURRENTLY
APPROVED GROUNDWATER
MONITORING PROGRAM
(OCT 2009)

DWG. NO. L-2

DRAWN DJA | APPROVED | SCALE 1"=30'-0" | PROJ. NO. 1998002.267

S:\CADD\WORK\Bodycote\RAP Modification-267-268\1998002-267 L2 HTB IEPA Currently Approved GW Monitoring Program April 2009.dwg - L-1 Well Loc Plan - Dec. 10, 2009 11:00am - dja

Mabbett & Associates, Inc.
Environmental Consultants & Engineers

A SERVICE DISABLED VETERAN OWNED SMALL BUSINESS

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Bedford, Massachusetts
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info@mabbett.com
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August 27, 2009

Mr. Don Heller
United States Environmental Protection Agency
Region 5
77 West Jackson Boulevard
Chicago, IL 60604-3590

Re: PCB Action Work Plan – Response to Question – July 15, 2009 US EPA Correspondence
Bodycote Thermal Processing Inc., Melrose Park, IL
ILD 005 071 808
Project No. 1998002.267

Dear Mr. Heller:

Mabbett and Associates, Inc. ("M&A"), on behalf of Bodycote Thermal Processing, Inc., ("Bodycote") is pleased to respond to the United States Environmental Protection Agency - Region 5's ("EPA" or "Agency") questions and comments received in a correspondence dated July 15, 2009, and in regard to M&A's PCB Action/Work Plan ("Work Plan") submitted to the Agency on September 12, 2006 for the above-captioned site.

By way of background, M&A's Work Plan constitutes a request for a "Risk-Based Disposal Approval" pursuant to 40 CFR §761.61(c). The following are M&A's responses to EPA's comments and questions raised in the Agency's correspondence received on July 15, 2009:

Comment 1: *When monitoring wells M&A-113, M&A-114 and all other monitoring wells in this vicinity were installed, were soil samples from the borings analyzed for PCBs? Are there any existing soil analytical PCB data from previous investigations or closures (e.g., UST closure)? This includes the new monitoring wells to be installed inside and outside of the northwestern portion of the Heat Treating Building, as mentioned in your September 12, 2006 letter. If so, please provide the PCB analytical data.*

Response 1: When groundwater monitoring wells M&A-113, M&A-114, and all other monitoring wells in this vicinity were installed, soil samples from the borings were not analyzed for PCBs. PCBs were not known to be present in the subsurface until, as stated in the *Work Plan*, "nine drums of recovered groundwater and DNAPL from M&A-113" were profiled for disposal in May 2000. It was discovered that PCBs were present in the liquid organic layer of eight of the nine drums. At that time, M&A began a subsurface investigation program consisting

of sampling the 20+ groundwater monitoring wells in the vicinity of groundwater monitoring wells M&A-113, M&A-114 in order to identify the aerial extent of PCB impacts.

There are no soil analytical PCB data from previous investigations or closures at the site. When groundwater monitoring wells M&A-130, M&A-131, and M&A-133 were installed inside and outside the northwestern portion of the Heat Treatment Building ("HTB"), soil samples were not collected from these locations based on the fact that there were no visual or olfactory indications that petroleum products were present in the soil borings. M&A collected groundwater samples from these locations and found that PCBs were not present above the laboratory method detection limit of 0.5µg/L.

Comment 2: *Are there sumps, trenches, underground piping, or other conveyances for oily waste waters located up-gradient or down-gradient of the NAPL recovery area? Have residual liquids and sludges in these structures been sampled for PCBs? If not, such residual materials must be sampled for PCB analysis.*

Response 2: An underground piping network is present in the vicinity of the NAPL recovery area. The underground piping network connects a sump pit located outside the eastern wall of the Pump House in the HTB to a condenser drain located in the Pump House which then runs to Oil/Water Separator No. 17, which is located outside the west wall of the HTB along Ruby Street. According to Bodycote personnel, the exact path of the underground piping is unknown. There are no "as-built" plans for subsurface piping in this area.

M&A personnel collected a residual oil sample from the sump pit located outside the eastern wall of the Pump House in the HTB and collected a residual sludge sample from the condenser drain located inside the Pump House and submitted it for PCB analysis on August 23, 2009, the results are currently pending. Refer to the Work Plan (attached).

Comment 3: *Is Oil/Water Separator No. 17 still operational? If so, samples of both oil and water from this unit must be analyzed for PCBs. If such sampling has already been done, please submit the results.*

Response 3: Oil/Water Separator No. 17 is currently in operation. Samples of oil and water from this unit have not been analyzed for the presence of PCBs according to Bodycote personnel. M&A personnel collected an oil sample and a water sample, and analyzed them for the presence of PCBs on August 23, 2009, the results are currently pending. Refer to the Work Plan Amendment (attached).

Comment 4: *Drawing L-2 of the Work Plan shows a concrete slab that surrounds Oil/Water Separator No. 17 and much of the boulevard along Ruby Street, and which serves as an "engineered barrier." Why was this barrier installed? If this pavement covers contaminated soil, has the soil been sampled for PCBs?*

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Response 4: The Illinois Environmental Protection Agency ("IEPA") conditionally approved the Remedial Action Plans for the HTB in technical review letters dated December 28, 2000 and March 12, 2001. IEPA's approval of soil remedial objectives for volatile organic compounds ("VOCs") was contingent upon the maintenance of the building floor slab and the establishment of an engineered barrier at one location specified by the IEPA outside the HTB. This requirement addresses potential exposures to VOCs in soil beneath the building and a small area outside the west wall of the building. As established by the IEPA conditional approval letter, an engineered barrier was constructed in November 2002 outside the west wall of the HTB. Based on the drawing (Figure L-2 included in the Work Plan) and confirmatory field measurements this area encompasses approximately 1,100 square feet (ft^2). Oil/Water Separator No. 17 referred to in the previous comment and a closed in place underground storage tank previously identified as UST No. 19 are located within the area of the engineered barrier.

The building slab and engineered barrier pavement covers soils impacted with VOCs. The soils have not been sampled for the presence of PCBs.

Comment 5: *The Work Plan must include a written certification, signed by the property owner, that all sampling plans, sample collection procedures, sample preparation procedures, extraction procedures, and instrumental/chemical analysis procedures used to assess or characterize the PCB contamination at the cleanup site, are on file at the location designated in the certificate, and are available for EPA inspection (40 CFR §761.61(c) and .61(a)(3)(E)).*

Response 5: The requested certification has been included in the Work Plan Amendment (attached).

Comment 6: *The Work Plan must include an explanation of how removal of PCBs "to the maximum extent practicable" will be determined.*

Response 6: Removal of PCBs "to the maximum extent practicable" will be determined based on the recovery rates at wells M&A-113 and M&A-114. Recovery of light non-aqueous phase liquid ("LNAPL") is currently taking place at M&A-114 and recovery of dense non-aqueous phase liquid ("DNAPL") is taking place at M&A-113. Once recoverable quantities of LNAPL and DNAPL no longer enter these wells, removal of PCBs to the maximum extent practicable will have been achieved.

Comment 7: *The Federal cleanup standard for dissolved PCBs in waters is 0.5 µg/L (40 CFR§761.79(b)(iii).*

Response 7: We propose to use the IEPA Groundwater Remediation Objective ("GRO") for Class II groundwaters. According to the IEPA, the GRO for PCBs in areas where groundwater is classified as Class II (restricted use) is 2.5µg/L. Pursuant to Illinois Administrative Code 35 IAC 742.1000 (Subpart J) ("Institutional Controls"), institutional controls must be used when a subject property is determined to be industrial/commercial and when the point of human

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exposure is located at a place other than the source. The following ordinances have been adopted and were implemented as an environmental institutional control in the area of the site:

- *Ordinance No. 321, An Ordinance Prohibiting the Use of Groundwater as a Potable Water Supply by the Installation or Use of Potable Water Supply Wells or by any Other Method, for the Village of Melrose Park, County of Cook, State of Illinois.*

- *Ordinance No. 509, An Ordinance Authorizing and Approving the Adoption of a Memorandum of Understanding Between the Village of Melrose Park and the Illinois Environmental Protection Agency in Connection with Establishing Institutional Controls for the Use of Ground Water as a Potable Water Supply in the Village of Melrose Park, County of Cook, State of Illinois.*

- *Memorandum of Understanding Between the Village of Melrose Park and the Illinois Environmental Protection Agency Regarding the Use of a Local Groundwater/Water Well Ordinance as an Environmental Institutional Control.*

Certified copies of the above listed ordinances are included in Attachment A.

According to the Illinois State Water Survey performed on-line by M&A on April 21, 2009, there are no community water supply wells or other potable wells located within 2,500 feet of the subject site. There are no regulated recharge areas or wellhead protection areas located within 2,500 feet of the subject site. There is one private well identified on the water well supply survey located approximately 1,100 feet south of the subject site. The well belongs to the HIWAY Restaurant, was installed in 1957, is approximately 250 feet in depth, was drilled into bedrock, and is used for industrial/commercial activities. Please refer to Drawing L-5 for a graphical representation of the Illinois State Water Survey.

Comment 8: *The Work Plan must include a specific groundwater monitoring program for verification that concentrations of dissolved PCBs at the Bodycote property line will not exceed 0.5 µ/L after active remediation is concluded.*

Response 8: Upon completion of removal of NAPL to the maximum extent practicable, M&A proposes to sample the perimeter groundwater monitoring wells (M&A-122, M&A-123, M&A-130, M&A-131, M&A-134, M&A-135, M&A-301, and M&A-302) on a biannual (*i.e.* twice-per-year) basis for the presence of PCBs. Sampling will continue until PCBs are not present at concentrations greater than 2.5 µg/L, during four consecutive biannual sampling events. This proposed plan will be subject to follow-up review based on receipt of any new data and/or regulatory requirements.

Comment 9: *The Work Plan will specify that Bodycote will file a restrictive covenant to the property deed which will ensure that the source of PCB contamination will be located and removed in the event that the overlying concrete floor of the Heat Treating Building is removed.*

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Response 9: On behalf of Bodycote, M&A prepared a draft deed restriction and included it Appendix E in the August 16, 2000 Remedial Action Plan submitted to the IEPA. M&A has added an amendment to this draft deed restriction and will record the deed restriction within 45 days of the receipt of No Further Remediation determination from the IEPA with the Office of the Recorder or Registrar of Titles for Cook County, State of Illinois, and the IEPA. Please see Attachment A attached for the draft deed restriction.

If you have any further questions, please write or call me or my associate James R. Greacen on 781-275-6050.

Very truly yours,

MABBETT & ASSOCIATES, INC.

BY

Paul D. Steinberg, P.E.
Senior Vice President and General Manager

/tw

Enclosures:
1. Amendment to September 12, 2006 PCB Action/Work Plan
2. Attachment A - Proposed Land Use Restrictions and Conditions
3. Attachment B - Ordinance 321
   Ordinance 509
   Memorandum between Melrose Park and IEPA
4. Exhibit L-1 – Engineered Barrier Site Plan

cc: ANM, JRG, CLM (MF)

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AMENDMENT TO

SEPTEMBER 12, 2006 PCB ACTION/WORK PLAN

VIII. Future Explorations

M&A personnel will collect a residual oil sample from inside sump pit located outside the Pump House located in the HTB and will collect a residual sludge sample from the condenser drain located inside the Pump House. The sample will be collected in laboratory supplied glassware and transported in a cooled container under chain-of-custody documentation to TestAmerica in Nashville, TN, for analysis for PCBs via US EPA Method 8082. Analytical results will be reported to the US EPA Region 5 within 30 days of receipt of laboratory results.

M&A personnel will collect an oil sample and a water sample from Oil/Water Separator No. 17. The samples will be collected in laboratory supplied glassware and transported in a cooled container under chain-of-custody documentation to TestAmerica in Nashville, TN, for analysis for PCBs via US EPA Method 8082. Analytical results will be reported to the US EPA Region 5 within 30 days of receipt of laboratory results.

XI. Certification:

I, Thomas Anderson certify that all sampling plans, sample collection procedures, sample preparation procedures, extraction procedures, and instrumental/chemical analysis procedures used to assess or characterize the PCB contamination at the cleanup site, are on file at the 1975 North Ruby Street, Melrose Park, Illinois facility designated in the certificate, and are available for EPA inspection (40 CFR §761.61(c) and .61(a)(3)(E)).

Thomas Anderson
Bodycote Thermal Processing Inc.
Director of Safety, Health
& Environmental
The Americas

8/27/2009
Date

ATTACHMENT A

Proposed Land Use Restrictions and Conditions

INSTITUTIONAL CONTROL
PROPOSED LAND USE RESTRICTIONS AND CONDITIONS
HEAT TREATMENT BUILDING
BODYCOTE THERMAL PROCESSING
1975 N RUBY ST
MELROSE PARK, IL

Based on current findings, as described in the *Site Investigation Report*, *Remedial Objectives Report*, and *Remedial Action Plan*, land use restrictions and conditions have been developed for a portion of the Heat Treatment Building at the Bodycote Thermal Processing Inc. facility at 1975 North Ruby Street in Melrose Park, IL. The restrictions and conditions described herein will prevent risk to human health and the environment associated with potential future exposure(s) to residual concentrations of constituents in soil and groundwater at the designated portion of the facility. Current and future activities and uses that are permitted and those that are controlled within the portion of the facility are described. Such current commercial/industrial activities and uses are anticipated to continue at the portion of the Heat Treatment Building subject to the restrictions and conditions for the reasonably foreseeable future. The following restrictions and conditions are presented:

1. Permitted Activities and Uses. Residual constituent concentrations in soil and groundwater at a portion of the Heat Treatment Building pose no significant risk to human health and the environment provided that:

   (i) Continued industrial/commercial land uses are permitted including, but not limited to, manufacturing and production operations, noninvasive uses such as material handling and loading, aboveground material storage, pedestrian and vehicular traffic, and vehicle parking.

   (ii) Subsurface excavation or other invasive activities including construction, maintenance, and repair of utilities below the local ground surface shall be conducted under an appropriate site-specific Health and Safety Plan ("HASP") prepared pursuant to Occupational and Safety and Health Administration (OSHA) regulations and guidelines and a Soil Management Plan ("SMP") prepared pursuant to 35 Illinois Administrative Code (IAC) Part 742 and/or other relevant and appropriate regulations. The HASP and SMP must be developed and implemented under the supervision of an appropriately accredited environmental professional in accordance with 35 IAC Part 742 and other applicable federal, state, and/or local statutes and regulations. The HASP shall include provisions to minimize human contact with contaminated soil and groundwater. The SMP shall provide for soil and groundwater management resulting from construction, excavation, and dewatering activities. Copies of the HASP and SMP are not attached to this document as there are no current plans to conduct subsurface excavation or other invasive activities within the portion of the building subject to these conditions.

   (iii) Such other activities or uses which, in the opinion of an appropriately accredited environmental professional, shall present no greater risk of harm to health, safety, public welfare, or the environment than the activities and uses set forth in this Paragraph.

2. Restricted Activities. Activities and uses which are inconsistent with the objectives of this Institutional Control, and which, if implemented at the portion(s) of the facility to which this Institutional Control applies, may result in a risk of harm to human health and/or the environment are as follows:

   (i) Residential, children's school, playground, children's daycare, recreational, and/or other such activities and uses which could result in unacceptable exposures;

   (ii) Gardening or other agricultural activities and uses which result in exposures to residual contamination through direct human contact with, ingestion of, and/or inhalation of contaminated soil, groundwater, agricultural produce, airborne dust, and/or related fugitive emissions;

   (iii) Site re-construction activities that compromises and/or removes the engineered barrier that currently restricts access to the area of residual contamination unless efforts are included following construction to restore the engineered barrier;

   (iv) Disturbance or removal of soil or groundwater existing below the engineered barrier unless such activity is conducted under an appropriate HASP and SMP as stipulated in Paragraph 1(ii);

   (v) Extraction and use of on-site groundwater at the facility for any purpose including but not limited to potable water, process water, and irrigation; and

   (vi) Other such activities and uses which, in the opinion of an appropriately accredited environmental professional, present a greater potential risk of harm to human health and/or the environment, other than those subject to the provisions of Paragraph 1.

3. Conditions Set Forth. The following conditions apply to prevent potential risk to human health and/or the environment:

   (i) The concrete floor, within the portion of the facility subject to this Institutional Control shown in Exhibit A-1, is an engineered barrier that prevents contact with residual concentrations of contaminants in soil and groundwater and must be maintained or re-established pursuant to Paragraph 2(iii);

   (ii) No subsurface excavation or other invasive activities shall occur which could result in potential exposure to identified contaminated soil and groundwater unless appropriate HASP and SMP provisions are developed and implemented as outlined in Paragraph 1(ii);

   (iii) At a minimum, SMP provisions must:

      (a) Establish control measures which restrict access to the soil excavation area by unauthorized personnel not covered under the HASP and limit potential physical and/or chemical hazards during periods when an open soil excavation is left unattended by project personnel; and

(b) Include excavated soil segregation, staging, stockpiling, transport, disposition, and/or on-site reuse (if appropriate) provisions which minimize inadvertent exposures to investigation and/or remediation-derived wastes through direct human contact with, ingestion of, and/or inhalation of contaminated soil, water, airborne dust, and/or related fugitive emissions by workers, visitors, abutters, and/or trespassers;

(iv) In the event that the overlying concrete floor of the Heat Treatment Building is removed, the source of PCB contamination will be located and removed to the maximum extent practicable.

ATTACHMENT B

Ordinance 321
Ordinance 509
Memorandum between Melrose Park and IEPA

STATE OF ILLINOIS)
) SS
COUNTY OF COOK)

CERTIFICATION OF ORDINANCE #321

I, Barbara Jasinski, the undersigned, do hereby certify that I am duly elected and qualified Village Clerk of the Village of Melrose Park, County of Cook, State of Illinois (the "Village"), and as such official I am the keeper of the records and files of the Village and of the President and Board of Trustees thereof (the "Village Board").

I do further certify that Ordinance #321was adopted by the President and Board of Trustees of the Village of Melrose Park at a public meeting of the Village Board held November 24, 1997, at the hour of 7:30 p.m., in the First Floor meeting Room of the Police Department, One North Broadway Avenue (Broadway & Main Street), Melrose Park, Illinois 60160.

IN WITNESS WHEREOF, I hereunto affix my official signature and the seal of the Village, this 15th day of June 2000.

Barbara Jasinski

Barbara Jasinski, Village Clerk

VILLAGE OF MELROSE PARK
COOK COUNTY, ILLINOIS

ORDINANCE NO. 321

AN ORDINANCE PROHIBITING THE USE OF GROUNDWATER AS A POTABLE WATER SUPPLY BY THE INSTALLATION OR USE OF POTABLE WATER SUPPLY WELLS OR BY ANY OTHER METHOD, FOR THE VILLAGE OF MELROSE PARK, COUNTY OF COOK, STATE OF ILLINOIS.

ADOPTED BY THE
PRESIDENT AND BOARD OF TRUSTEES
OF THE
VILLAGE OF MELROSE PARK

THIS 24TH DAY OF NOVEMBER, 1997

RONALD M. SERPICO, Village President
BARBARA JASINSKI, Village Clerk

Board Of Trustees

CARLOTTA "LOLLIE" ARIOLA
JOHN S. CONTEDUCA
CATHLEEN ITALIA
FRED LAMB
RUBEN LOMELI
JOSEPH McMILLAN

Published by authority of the
President and Board of Trustees
Of the Village of Melrose Park,
Cook County, Illinois on
This 24TH day of November, 1997.

ORDINANCE NO. 321

AN ORDINANCE PROHIBITING THE USE OF GROUNDWATER AS A POTABLE WATER SUPPLY BY THE INSTALLATION OR USE OF POTABLE WATER SUPPLY WELLS OR BY ANY OTHER METHOD, FOR THE VILLAGE OF MELROSE PARK, COUNTY OF COOK, STATE OF ILLINOIS .

* * * * *

ORDINANCE NO. 321

AN ORDINANCE PROHIBITING THE USE OF GROUNDWATER AS A POTABLE WATER SUPPLY BY THE INSTALLATION OR USE OF POTABLE WATER SUPPLY WELLS OR BY ANY OTHER METHOD, FOR THE VILLAGE OF MELROSE PARK, COUNTY OF COOK, STATE OF ILLINOIS .

* * * * *

WHEREAS, the Village of Melrose Park, Cook County, State of Illinois (the "Village") is a duly organized and existing Village created under the provisions of the laws of the State of Illinois, and is now operating under the provisions of the Illinois Municipal Code, and all laws amendatory thereof and supplementary thereto with full powers to enact ordinances for the benefit of the residents of the Village.

WHEREAS, The President and the Board of Trustees (the "Corporate Authorities") of the Village of Melrose Park, County of Cook, State of Illinois, have determined that it is advisable, necessary and in the best interest of the Village to prohibit the use of groundwater as a potable water supply by the installation or use of potable water supply wells or by any other method.

NOW THEREFORE, BE IT ORDAINED by the Village President and the Board of Trustees of the Village of Melrose Park, Cook County Illinois:

ARTICLE I.
IN GENERAL

Section 01. Incorporation Clause.

The parties agree that the above information, contained in the preamble, is hereby incorporated into this ordinance by reference.

Section 02. Purpose.

The purpose of this ordinance is to prohibit the use of groundwater as a potable water supply by the installation or use of potable water supply wells or by any other method.

Section 03. Invocation of authority.

This ordinance is enacted pursuant to the authority granted to this Village by Constitution of the State of Illinois and the Illinois Compiled Statutes.

Section 04. State Law Adopted.

All applicable provisions of the Illinois Compiled Statutes, including the Illinois Municipal Code, as may be amended from time to time, relating to the purposes of this ordinance are hereby incorporated herein by reference.

Sections 05-09. Reserved.

ARTICLE II.
GROUND WATER AS A POTABLE WATER SUPPLY

Section 10. Use of Groundwater as a Potable Water Supply Prohibited.

The use or attempt to use as a potable water supply groundwater from within the corporate limits of the Village of Melrose Park by the installation or drilling of wells or by any other method is hereby prohibited.

Section 11. Exception(s).

After a determination by the Village President, the Village of Melrose Park may use as a potable water supply groundwater from within the corporate limits of the Village of Melrose Park by the installation or drilling of wells or by any other method. This exception only applies for uses that are determined, by the Village President, to be in the best interest of the citizens of the Village of Melrose Park.

Section 12. Penalties.

Any person violating the provisions of this ordinance shall be subject to a fine of up to $ 1,000.00, for each violation.

Section 13. Definitions.

"Person" is any individual, partnership, co-partnership, firm, company, limited liability company, corporation, association, joint stock company, trust, estate, or any other legal entity, or their legal representatives, agents or assigns.

"Potable water" is any water used for human or domestic consumption, including, but not limited to, water used for drinking, bathing, washing dishes, or preparing foods.

ARTICLE III.
SAVINGS CLAUSES, PUBLICATION, EFFECTIVE DATE

Section 14. Headings.

The headings for the articles, sections, paragraphs and sub-paragraphs of this ordinance are inserted solely for the convenience of reference and form no substantive part of this ordinance nor should they be used in any interpretation or construction of any substantive provisions of this ordinance.

Section 15. Severability.

The provisions of this ordinance are hereby declared to be severable and should any provision, clause, sentence, paragraph, sub-paragraph, section, or part of this ordinance be determined to be in conflict with any law, statute or regulation by a court of competent jurisdiction, said provision shall be excluded and deemed inoperative,

unenforceable, and as though not provided for herein, and all other provisions shall remain unaffected, unimpaired, valid and in full force and effect. It is hereby declared to be the legislative intent of the Board of Trustees that this ordinance would have been adopted had not such unconstitutional or invalid provision, clause, sentence, paragraph, sub-paragraph, section, or part thereof had not been included.

Section 16. Superseder.

All code provisions, ordinances, resolutions and orders, or parts thereof, in conflict herewith, are to the extent of such conflict hereby superseded.

Section 17. Publication.

A full, true and complete copy of this ordinance shall be published in pamphlet form or in a newspaper published and of general circulation within the Village as provided by the Illinois Municipal Code, as amended.

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Section 18. Effective date

This ordinance shall be in full force and effect upon passage, approval and ten (10) days after the publication hereof, as provided by law.

On The Individual Poll And Voice Vote Of The Board Of Trustees:

AYE VOTES: 5

NAY VOTES: 0

ABSTAIN: 0

ABSENT: 1

SO PASSED, ADOPTED, APPROVED AND ENACTED IN AND AT THE VILLAGE OF MELROSE PARK, COUNTY OF COOK, STATE OF ILLINOIS, THIS 24th DAY OF NOVEMBER, 1997 A.D.

APPROVED:

RONALD M. SERPICO,
VILLAGE PRESIDENT

ATTEST:

BARBARA JASINSKI,
VILLAGE CLERK

Recorded in the Municipal Records: November 24, 1997

Published in pamphlet form on November 25, 1997

STATE OF ILLINOIS)
) SS
COUNTY OF COOK)

CERTIFICATION OF ORDINANCE #509

I, Barbara Jasinski, the undersigned, do hereby certify that I am duly elected and qualified Village Clerk of the Village of Melrose Park, County of Cook, State of Illinois (the "Village"), and as such official I am the keeper of the records and files of the Village and of the President and Board of Trustees thereof (the "Village Board").

I do further certify that Ordinance #509 was adopted by the President and Board of Trustees of the Village of Melrose Park at a public meeting of the Village Board held April 24, 2000, at the hour of 7:30 p.m., in the First Floor meeting Room of the Police Department, One North Broadway Avenue (Broadway & Main Street), Melrose Park, Illinois 60160.

IN WITNESS WHEREOF, I hereunto affix my official signature and the seal of the Village, this 15th day of June 2000.

Barbara Jasinski

Barbara Jasinski, Village Clerk

VILLAGE OF MELROSE PARK
COOK COUNTY, ILLINOIS

ORDINANCE NO. 509

AN ORDINANCE AUTHORIZING AND APPROVING THE ADOPTION OF A MEMORANDUM OF UNDERSTANDING BETWEEN THE VILLAGE OF MELROSE PARK AND THE ILLINOIS ENVIRONMENTAL PROTECTION AGENCY IN CONNECTION WITH ESTABLISHING INSTITUTIONAL CONTROLS FOR THE USE OF GROUND WATER AS A POTABLE WATER SUPPLY IN THE VILLAGE OF MELROSE PARK, COUNTY OF COOK, STATE OF ILLINOIS.

ADOPTED BY THE
PRESIDENT AND BOARD OF TRUSTEES
OF THE
VILLAGE OF MELROSE PARK

THIS 24TH DAY OF APRIL, 2000

RONALD M. SERPICO, Village President
BARBARA JASINSKI, Village Clerk

Board Of Trustees

CARLOTTA "LOLLIE" ARIOLA
JOHN S. CONTEDUCA
CATHLEEN COSSIDENT ITALIA
THOMAS KLEIN
FRED LAMB
RUBEN LOMELI

Published by authority of the
President and Board of Trustees
Of the Village of Melrose Park,
Cook County, Illinois on
This 25th day of April, 2000.

ORDINANCE NO. 509

AN ORDINANCE AUTHORIZING AND APPROVING THE ADOPTION OF A MEMORANDUM OF UNDERSTANDING BETWEEN THE VILLAGE OF MELROSE PARK AND THE ILLINOIS ENVIRONMENTAL PROTECTION AGENCY IN CONNECTION WITH ESTABLISHING INSTITUTIONAL CONTROLS FOR THE USE OF GROUND WATER AS A POTABLE WATER SUPPLY IN THE VILLAGE OF MELROSE PARK, COUNTY OF COOK, STATE OF ILLINOIS .

* * * * *

WHEREAS, the Village of Melrose Park, Cook County, State of Illinois ("the Village") is a duly organized and existing Village created under the provisions of the laws of the State of Illinois, and is now operating under the provisions of the Illinois Municipal Code, and all laws amendatory thereof and supplementary thereto with full powers to enact ordinances for the benefit of the residents of the Village; and

WHEREAS, the Village President, the Honorable Ronald M. Serpico, the Village Clerk, the Honorable Barbara Jasinski, having taken office on May 1, 1997 and the Village Board of Trustees, the Honorable Carlotta "Lollie" Ariola, John S. Conteduca, Cathleen Cossident Italia, Fred Lamb, and Ruben Lomeli, having taken office on May 1, 1999, and Trustee Thomas Klein, having been appointed and sworn into office on March 27, 2000, respectively, constitute the duly elected, appointed, qualified and acting officials of the Village; and

WHEREAS, at the President and Board of Trustees Meeting of November 24, 1997, the Corporate Authorities of the Village of Melrose Park adopted Ordinance No. 321, entitled "An Ordinance Prohibiting the Use of Groundwater as a Potable Water Supply by the Installation or Use of Potable Water Supply Wells or by any other Method..."; and

WHEREAS, the effect of Ordinance No. 321 was to prohibit the use of groundwater as a potable water supply within the Village of Melrose Park, with the only exception being that the Village of Melrose Park may utilize groundwater as a potable water supply should certain emergency circumstances arise; and

WHEREAS, in order to ensure the long-term integrity of Ordinance No. 321 as an environmental institutional control and to minimize any risk to human health and the environment from contamination, the Village of Melrose Park desires to enter into a Memorandum of Understanding (hereinafter "MOU") with the Illinois Environmental Protection Agency (hereinafter "IEPA"); and

WHEREAS, pursuant to said MOU, the Village shall assume certain responsibilities, pursuant to 35 Ill.Adm. Code 742.1015(i), with respect to monitoring and siting public water supply wells, the specific responsibilities of the Village are more particularly described in said MOU, a copy of which is attached hereto as Exhibit A; and

WHEREAS, the President and the Board of Trustees (the "Corporate Authorities") of the Village of Melrose Park, County of Cook, State of Illinois, have determined that the adoption of the Memorandum of Understanding between the Village and the Illinois Environmental Protection Agency is necessary, advisable and in the best interest of the Village and its residents;

NOW THEREFORE, BE IT ORDAINED by the Village President and the Board of Trustees of the Village of Melrose Park, Cook County, Illinois:

ARTICLE I.
IN GENERAL

Section 01. Incorporation Clause.

The President and Board of Trustees of the Village (the "Village Board") hereby find that all of the recitals hereinbefore stated as contained in the preambles to this Ordinance are full, true and correct and does hereby, by reference, incorporate and make them part of the Ordinance as legislative findings.

Section 02. Purpose.

The purpose of this Ordinance is to authorize and approve the adoption and execution of a Memorandum of Understanding between the Village and the Illinois Environmental Protection Agency, regarding the use of Ordinance No. 321 as an environmental institutional control.

Section 03. Invocation of authority.

This ordinance is enacted pursuant to the authority granted to this Village by Constitution of the State of Illinois and the Illinois Compiled Statutes.

Section 04. State Law Adopted.

All applicable provisions of the Illinois Compiled Statutes, including the Illinois Municipal Code, as may be amended from time to time, relating to the purposes of this ordinance are hereby incorporated herein by reference.

Sections 05-09. Reserved.

ARTICLE II.
AUTHORIZATION OF MEMORANDUM OF UNDERSTANDING

Section 10.00 Approval & Adoption of Memorandum of Understanding.

That the terms and provisions of the Memorandum of Understanding between the Village and the Illinois Environmental Protection Agency, regarding the use of Ordinance No. 321 as an environmental institutional control, are hereby approved in substantially the same form as attached hereto as Exhibit A, with such insertions, omissions and changes as shall be approved by the Village President and the Village Attorney or other members of the governing body of the Village executing the same.

Section 11.00 Authorization for Execution of MOU.

The Village President is hereby authorized and directed to execute, and the Village Clerk, if necessary, is hereby authorized and directed to attest and countersign the Memorandum of Understanding and any related exhibits attached thereto, whether or not such documents are attached to this Ordinance, and the Village Clerk, if necessary, is also authorized to affix the seal of the Village to such documents.

Section 12.00 Other Actions Authorized.

The Village Clerk is hereby authorized and directed to prepare and certify the documents referenced in Section III of the MOU and the officers, employees and/or agents of the Village shall take all action necessary or reasonably required to carry out, give effect to and consummate the transactions contemplated by this Ordinance and to take all action necessary in conformity therewith, including, without limitation, the execution and delivery of any documents required to be delivered in connection with this Ordinance and the MOU.

ARTICLE III.
SAVINGS CLAUSES, PUBLICATION, EFFECTIVE DATE

Section 13.00 Headings.

The headings for the articles, sections, paragraphs and sub-paragraphs of this Ordinance are inserted solely for the convenience of reference and form no substantive part of this Ordinance nor should they be used in any interpretation or construction of any substantive provisions of this Ordinance.

Section 14.00 Severability.

The provisions of this Ordinance are hereby declared to be severable and should any provision, clause, sentence, paragraph, sub-paragraph, section, or part of this Ordinance be determined to be in conflict with any law, statute or regulation by a court of competent jurisdiction, said provision shall be excluded and deemed inoperative, unenforceable, and as though not provided for herein, and all other provisions shall remain unaffected, unimpaired, valid and in full force and effect. It is hereby declared to be the legislative intent of the Board of Trustees that this Ordinance would have been adopted had not such unconstitutional or invalid provision, clause, sentence, paragraph, sub-paragraph, section, or part thereof had not been included.

Section 15.00 Superseder.

All code provisions, ordinances, resolutions and orders, or parts thereof, in conflict herewith, are to the extent of such conflict hereby superseded.

Section 16.00 Publication.

A full, true and complete copy of this Ordinance shall be published in pamphlet form or in a newspaper published and of general circulation within the Village as provided by the Illinois Municipal Code, as amended.

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Section 17.00 Effective date

This Ordinance shall be in full force and effect upon passage and approval, as provided by the Illinois Municipal Code, as amended.

On The Individual Poll And Voice Vote Of The Board Of Trustees:

AYE VOTES: Trustee Ariola, Trustee Conteduca, Trustee Lamb, Trustee Lomeli, Trustee Klein

NAY VOTES:

ABSTAIN:

ABSENT: Trustee Italia

SO PASSED, ADOPTED, APPROVED AND ENACTED IN AND AT THE VILLAGE OF MELROSE PARK, COUNTY OF COOK, STATE OF ILLINOIS, THIS TWENTY-FOURTH DAY OF APRIL, 2000 A.D.

APPROVED:

RONALD M. SERPICO,
VILLAGE PRESIDENT

ATTEST:
Barbara Jasinski
Village Clerk

(SEAL)

Recorded in the Municipal Records: April 24, 2000

Published in pamphlet form: April 25, 2000

MEMORANDUM OF UNDERSTANDING BETWEEN THE VILLAGE OF MELROSE PARK AND THE ILLINOIS ENVIRONMENTAL PROTECTION AGENCY REGARDING THE USE OF A LOCAL GROUNDWATER/WATER WELL ORDINANCE AS AN ENVIRONMENTAL INSTITUTIONAL CONTROL

I. PURPOSE AND INTENT

A. This Memorandum of Understanding (hereinafter "MOU") entered into by and between the Village of Melrose Park and the Illinois Environmental Protection Agency (hereinafter "Illinois EPA") is entered into for the purpose of satisfying the requirements of 35 Ill.Adm. Code 742.1015 for the use of groundwater or water well ordinances as environmental institutional controls. The Illinois EPA has reviewed the groundwater or water well ordinance of the Village of Melrose Park (a copy of which is attached hereto as "Exhibit A") and determined that the Ordinance prohibits the use of groundwater for potable purposes and the installation and use of new potable water supply wells by private entities but does not expressly prohibit those activities by the Village of Melrose Park itself. In such cases, 35 Ill.Adm. Code 742.1015(a) provides that the unit of local government may enter into an MOU with the Illinois EPA to allow the use of the Ordinance as an institutional control.

B. The intent of this Memorandum of Understanding is to specify the responsibilities that must be assumed by the Village of Melrose Park to satisfy the requirements for MOUs as set forth at 35 Ill.Adm. Code 742.1015(i).

II. DECLARATIONS AND ASSUMPTION OF RESPONSIBILITY

In order to ensure the long-term integrity of the groundwater/water well ordinance as an environmental institutional control and that risk to human health and the environment from contamination left in place in reliance on the groundwater/ water well ordinance is effectively managed; the Village of Melrose Park hereby assumes the following responsibilities pursuant to 35 Ill.Adm. Code 742.1015(i):

A. The Village of Melrose Park will notify the Illinois EPA Bureau of Land of any proposed ordinance changes, in connection with its well ordinance or this MOU, and notify the Illinois EPA Bureau of Land of any requests for variance that would impact or otherwise affect the intent of the Village's well ordinance and/or this MOU, at least thirty (30) days prior to the date the Village of Melrose Park is scheduled to take action on the proposed change or request (35 Ill.Adm. Code 742.1015(i)(4));

B. The Village of Melrose Park will maintain a registry of all sites within its Corporate Limits that have received "No Further Remediation" determinations from the Illinois EPA (35 Ill.Adm. Code 742.1015(i)(5)). In an effort to assist the Village of Melrose Park with maintaining said registry, the Illinois EPA shall forward to the Village of Melrose Park copies of any and all Illinois EPA letters, communications, or the like in which a "No Further Remediation" determination has been made by the Illinois EPA with respect to any real estate within the Corporate Limits of the Village of Melrose Park.

C. The Village of Melrose Park will review the registry of sites established under paragraph II. B prior to siting public potable water supply wells within the Corporate Limits of the Village of Melrose Park (35 Ill.Adm. Code 742.1015(i)(6)(A));

D. Prior to siting public potable water supply wells and/or using potable water from any such well, the Village of Melrose Park will determine whether the potential source of potable water has been or may be affected by contamination left in place at the sites tracked and reviewed under paragraphs II.B. and C (35 Ill.Adm. Code 742.1015(i)(6)(B)); and

E. The Village of Melrose Park will take action as necessary to ensure that the potential source of potable water is protected from contamination or treated before it is used as a potable water supply (35 Ill.Adm. Code 742.1015(i)(6)(C)).

NOTE: Notification under paragraphs II A and II B above or other communications concerning this MOU should be directed to:

If to the Illinois EPA:

Manager, Division of Remediation Management
Bureau of Land
Illinois Environmental Protection Agency
P.O. Box 19276
Springfield, Illinois 62794-9276

If to the Village of Melrose Park:

Village Attorney
Village of Melrose Park
1000 N. 25th Avenue
Melrose Park, Illinois 60160

III. SUPPORTING DOCUMENTATION

The following documentation is required by 35 Ill.Adm. Code 742.1015(i) and is attached to this MOU:

A. Attachment A: A copy of Village of Melrose Park Ordinance No. 321, entitled "An Ordinance Prohibiting the Use of Groundwater as a Potable Water Supply by the Installation or Use of Potable Water Supply Wells or by any Other Method, for the Village of Melrose Park, County of Cook, State of Illinois." A certificate of the Village Clerk is attached thereto certifying that said Ordinance, at the time of the adoption of this MOU, is a valid legislative enactment and is in full force and effect in the Village of Melrose Park. (35 Ill.Adm. Code 742.1015(i)(3));

B. Attachment B: Certificate of the Village Clerk certifying that said Ordinance No. 321 is applicable everywhere within the Corporate Limits of the Village of Melrose Park (35 Ill.Adm. Code 742.1015(i)(2));

C. Attachment C: A Certified Copy of Village of Melrose Park Ordinance No. _____, entitled "An Ordinance Authorizing and Approving the Adoption of a Memorandum of Understanding between the Village of Melrose Park and the Illinois Environmental Protection Agency In Connection with Establishing Institutional Controls for the Use of Ground Water as a Potable Water Supply in the Village of Melrose Park, County of Cook, State of Illinois."

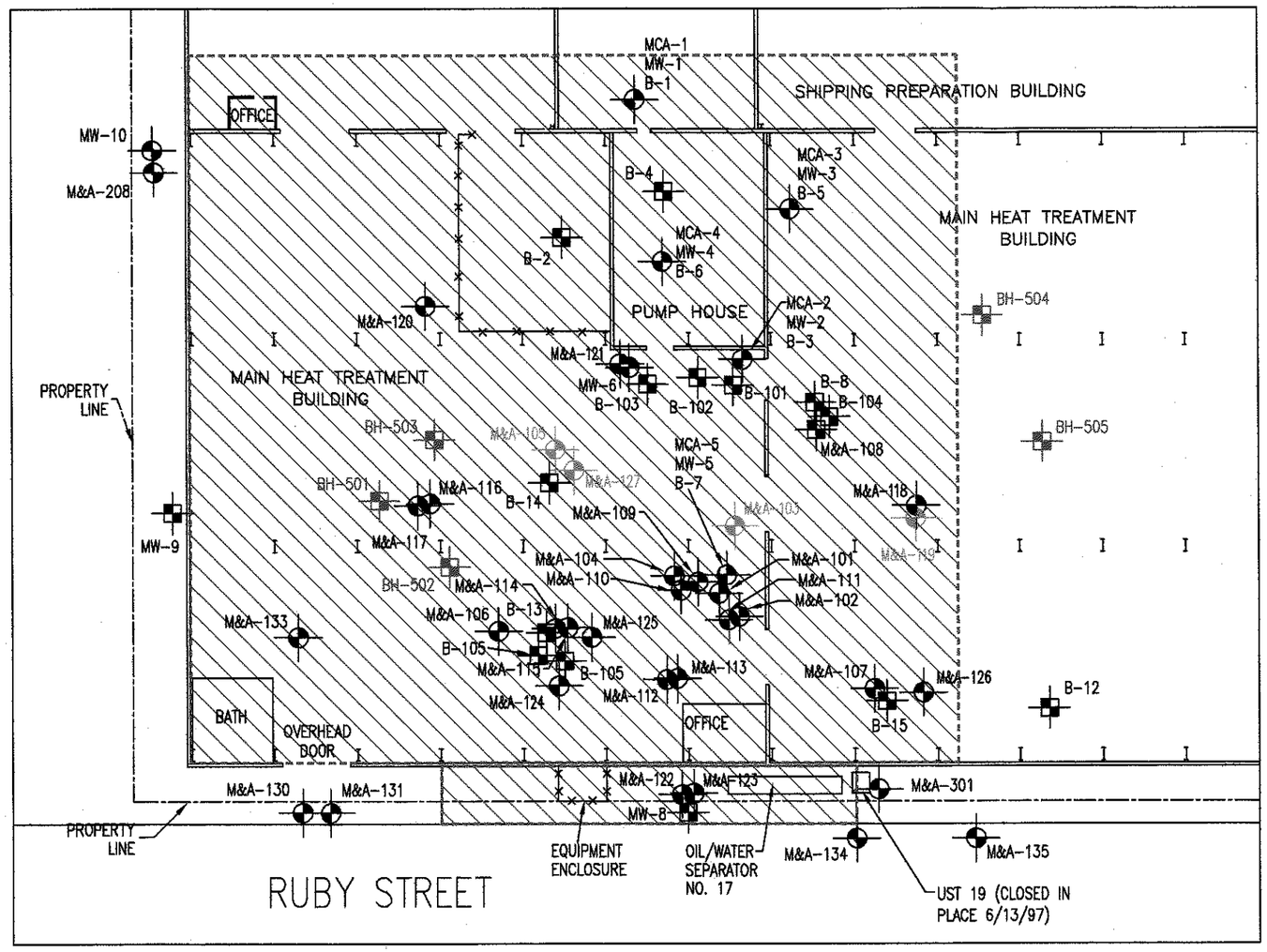
IN WITNESS WHEREOF, the lawful representatives of the parties hereto have caused this MOU to be signed, in counterpart, as follows:

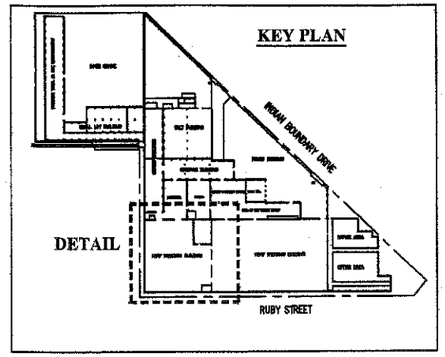
FOR: THE VILLAGE OF MELROSE PARK

BY: _____ DATE: 5/1 -2000
Ronald M. Serpico
Village President

FOR: ILLINOIS ENVIRONMENTAL PROTECTION AGENCY:

BY: _____ DATE: _____ -2000
(Name and title of signatory)





LEGEND:

- MONITORING WELL LOCATION
- MONITORING WELL CLOSED IN PLACE 2008
- BORING LOCATION
- JUNE 25, 2009 SOIL BORING LOCATION
- APPROXIMATE PROPERTY LINE
- CHAIN LINK FENCE
- SUPPORTING COLUMN
- ENGINEERED BARRIER AERIAL EXTENT

N

SCALE:

0 40' 80' 120'

NOTES:

1. MONITORING WELL AND BORING LOCATIONS INSTALLED PRIOR TO 1997 ARE BASED ON FIELD MEASUREMENTS TAKEN BY M&A PERSONNEL.
2. MONITORING WELL AND BORING LOCATIONS INSTALLED DURING AND AFTER 1997 ARE BASED ON FIELD MEASUREMENTS TAKEN BY AN ILLINOIS REGISTERED LAND SURVEYOR.

BODYCOTE THERMAL PROCESSING, INC. MELROSE PARK, ILLINOIS	ENGINEERED BARRIER SITE PLAN		L-1
Mabbett & Associates Environmental Consultants & Engineers	SCALE: 1"=40'-0"	DR BY: DJA	
	DATE: 8/25/09	AP BY: PDS	PROJECT NO. 1998002.267

S:\CADD\WORK\Bodycote\1998002.283\1998002-267-PCB-ENG BARRIER.dwg - Model - Aug. 25, 2009 2:53pm - dja

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF: LU-9J

CERTIFIED MAIL: 7001 0320 0006 0192 6173
RETURNED RECEIPT REQUESTED

July 15, 2009

Paul D. Steinberg, P.E., LSP
Mabbett & Associates, Inc.
5 Alfred Circle
Bedford, Massachusetts 01730-2346

RE: PCB Action Work Plan
Bodycote Thermal Processing, Melrose Park, IL
ILD 005 071 808

Dear Mr. Steinberg:

We are continuing our review of the September 12, 2006, *Polychlorinated Biphenyl Action/Work Plan*, for Bodycote Thermal Processing in Melrose Park, Illinois. Your cover letter indicates that that the plan is submitted pursuant to 40 CFR §761.61. U.S. EPA believes that this request falls under a risk-based disposal action request under 40 CFR §761.61(c) and will review it as such. Please let us know if this is not your intent.

The following questions and comments must be addressed before we can further review this risk-based disposal work plan:

- When monitoring wells M&A-113, M&A-114 and all other monitoring wells in this vicinity were installed, were soil samples from the borings analyzed for PCBs? Are there any existing soil analytical PCB data from previous investigations or closures (e.g., UST closure)? This includes the new monitoring wells to be installed inside and outside of the northwestern portion of the Heat Treating Building, as mentioned in your September 14, 2006 letter. If so, please provide the PCB analytical data.

- Are there sumps, trenches, underground piping, or other conveyances for oily waste waters located upgradient or downgradient of the NAPL recovery area? Have residual liquids and sludges in these structures been sampled fro PCBs? If not, such residual materials must be sampled for PCB analysis.

- Is Oil/Water Separator No.17 still operational? If so, samples of both oil and water from this unit must be analyzed for PCBs. If such sampling has already been done, please submit the results.

- Drawing L-2 of the *Work Plan* shows a concrete slab that surrounds Oil/Water Separator No. 17 and much of the boulevard along Ruby Street, and which serves as an "engineered barrier". Why was this barrier installed? If this pavement covers contaminated soil, has the soil been sampled for PCBs?

- The *Work Plan* must include a written certification, signed by the property owner, that all sampling plans, sample collection procedures, sample preparation procedures, extraction procedures, and instrumental/chemical analysis procedures used to assess or characterize the PCB contamination at the cleanup site, are on file at the location designated in the certificate, and are available for EPA inspection (40 CFR §761.61(c) and .61(a)(3)(E)).

- The *Work Plan* must include an explanation of how removal of PCBs "to the maximum extent practicable" will be determined.

- The Federal cleanup standard for dissolved in waters is 0.5 ug/L (40 CFR §761.79(b)(iii).

- The *Work Plan* must include a specific ground water monitoring program for verification that concentrations of dissolved PCBs at the Bodycote property line will not exceed 0.5 ug/L after active remediation is concluded.

- The *Work Plan* will specify that Bodycote will file a restrictive covenant to the property deed which will ensure that the source of PCB contamination will be located and removed in the event that the overlying concrete floor of the Heat Treating Building is removed.

Revisions to the *Polychlorinated Biphenyl Action/Work Plan* are to be submitted to this address within 45 days of receipt of this letter.

Please contact me at (312) 353-1248 or by e-mail at Heller.Donald@epa.gov if you have questions.

Sincerely,

Donald A. Heller

Donald A. Heller, Corrective Action Project Manager
Corrective Action Section 1
Remediation and Reuse Branch

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Paul D. Steinberg, PE
Mabbett and Associates, Inc.
5 Alfred circle
Bedford, MA
01730-2346

COMPLETE THIS SECTION ON DELIVERY

A. Received by *(Please Print Clearly)* B. Date of Delivery

C. Signature
X [signature] ☐ Agent ☐ Addressee

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
☒ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? *(Extra Fee)* ☐ Yes

2. Article Number *(Transfer from service label)* 7001 0320 0006 0192 6173

PS Form 3811, March 2001 Domestic Return Receipt 102595-01-M-1424

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

OFFICIAL USE

Postage	$ 44
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	$ 554

LOOP STATION 60604-9998 Postmark Here JUL 15 2003 USPS

Sent To P. Steinberg / Mabbett + Assoc. (Heller LU-9)
Street, Apt. No.; or PO Box No. 5 Alfred Circle
City, State, ZIP+4 Bedford, MA 01730-2346

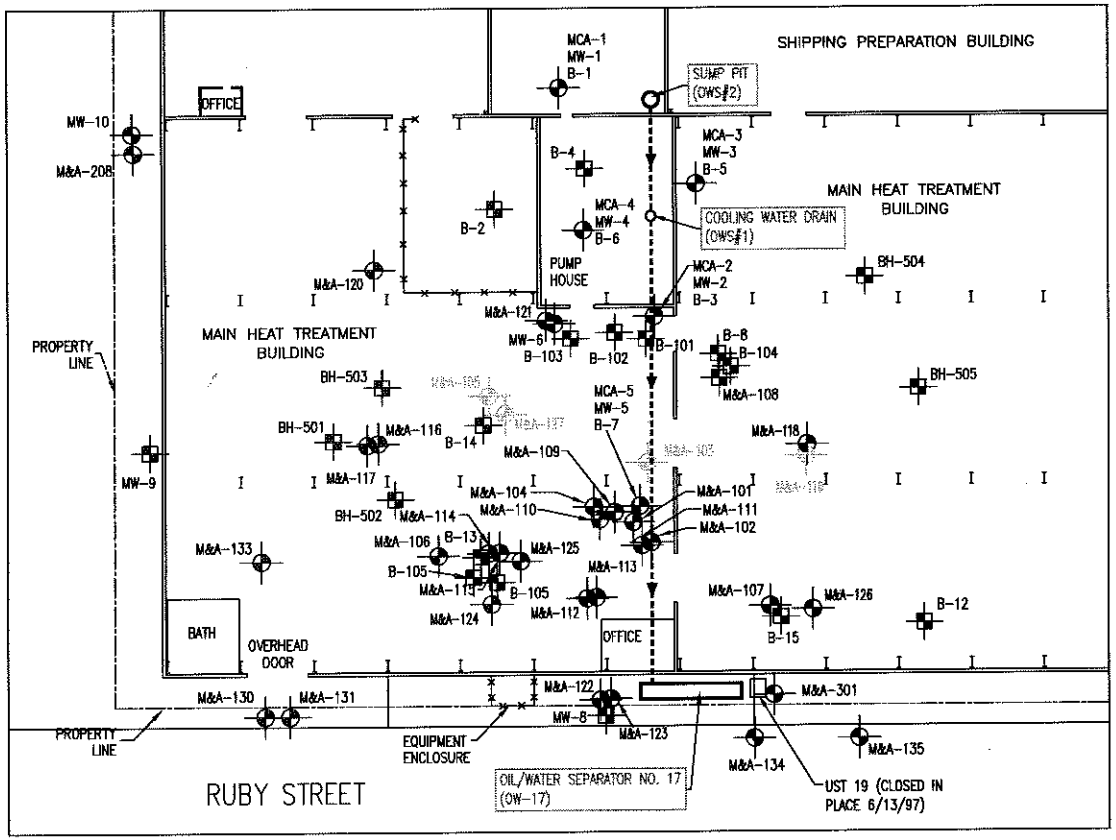
PS Form 3800, January 2001 See Reverse for Instructions

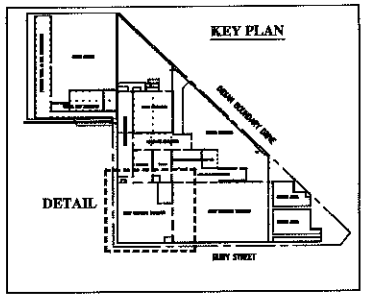
7001 0320 0006 0192 6173

PCB SAMPLING
OF OILY WASTE WATERS

BODYCOTE THERMAL PROCESSING

AUGUST 2009





LEGEND:

- MONITORING WELL LOCATION
- MONITORING WELL CLOSED IN PLACE 2008
- BORING LOCATION
- (OWS#2) PCB SAMPLE LOCATION
- APPROXIMATE PROPERTY LINE
- CHAIN LINK FENCE
- SUPPORTING COLUMN
- SUBSURFACE DRAINAGE PIPE WITH FLOW ARROW

SCALE:

0 40' 80' 120'

NOTES:

1. MONITORING WELL AND BORING LOCATIONS INSTALLED PRIOR TO 1997 ARE BASED ON FIELD MEASUREMENTS TAKEN BY M&A PERSONNEL.
2. MONITORING WELL AND BORING LOCATIONS INSTALLED DURING AND AFTER 1997 ARE BASED ON FIELD MEASUREMENTS TAKEN BY AN ILLINOIS REGISTERED LAND SURVEYOR.

BODYCOTE THERMAL PROCESSING, INC. MELROSE PARK, ILLINOIS	PCB SAMPLING LOCATIONS PLAN	
Mabbett & Associates	SCALE: 1"=40'-0"	DR BY: DJA
	DATE: 8/25/09	AP BY: PDS

L-1

PROJECT NO. 1998002.267

TestAmerica
THE LEADER IN ENVIRONMENTAL TESTING
2960 Foster Creighton Road Nashville, TN 37204 * 800-765-0980 * Fax 615-726-3404

September 03, 2009 3:24:51PM

Client: Mabbett & Associates, Inc. (10615)
5 Alfred Circle
Bedford, MA 01730
Attn: Christopher Mabbett

Work Order: NSH1683
Project Name: Bodycote 1998002.266
Project Nbr: 1998002.266
P/O Nbr:
Date Received: 08/19/09

SAMPLE IDENTIFICATION	LAB NUMBER	COLLECTION DATE AND TIME
OWS-1	NSH1683-01	08/18/09 15:30
OWS-2	NSH1683-02	08/18/09 15:00
OW-17	NSH1683-03	08/18/09 13:15
OW-17	NSH1683-04	08/18/09 13:00

An executed copy of the chain of custody, the project quality control data, and the sample receipt form are also included as an addendum to this report. If you have any questions relating to this analytical report, please contact your Laboratory Project Manager at 1-800-765-0980. Any opinions, if expressed, are outside the scope of the Laboratory's accreditation.

Illinois Certification Number: 002179

RELEASED
9/21/20 – 2020-003646
TJW per CLM

The Chain(s) of Custody, 2 pages, are included and are an integral part of this report.

All solids results are reported in wet weight unless specifically stated.
Estimated uncertainty is available upon request.
This report has been electronically signed.
Report Approved By:

Ken A. Hayes

Senior Project Manager

TestAmerica
THE LEADER IN ENVIRONMENTAL TESTING
2960 Foster Creighton Road Nashville, TN 37204 * 800-765-0980 * Fax 615-726-3404

Client	Mabbett & Associates, Inc. (10615)	Work Order:	NSH1683
	5 Alfred Circle	Project Name:	Bodycote 1998002.266
	Bedford, MA 01730	Project Number:	1998002.266
Attn	Christopher Mabbett	Received:	08/19/09 08:10

ANALYTICAL REPORT

Analyte	Result	Flag	Units	MRL	Dilution Factor	Analysis Date/Time	Method	Batch
Sample ID: NSH1683-01 (OWS-1 - Soil) Sampled: 08/18/09 15:30								
General Chemistry Parameters								
% Dry Solids	**50.6**		%	0.500	1	09/03/09 10:53	SW-846	9090355
Polychlorinated Biphenyls by EPA Method 8082								
PCB-1016	ND	RL1	mg/kg dry	3.28	50	08/28/09 08:27	SW846 8082	9083268
PCB-1221	ND	RL1	mg/kg dry	3.28	50	08/28/09 08:27	SW846 8082	9083268
PCB-1232	ND	RL1	mg/kg dry	3.28	50	08/28/09 08:27	SW846 8082	9083268
PCB-1242	ND	RL1	mg/kg dry	3.28	50	08/28/09 08:27	SW846 8082	9083268
PCB-1248	ND	RL1	mg/kg dry	3.28	50	08/28/09 08:27	SW846 8082	9083268
PCB-1254	ND	RL1	mg/kg dry	3.28	50	08/28/09 08:27	SW846 8082	9083268
PCB-1260	ND	RL1	mg/kg dry	3.28	50	08/28/09 08:27	SW846 8082	9083268
Surr: Tetrachloro-meta-xylene (19-147%)	*100 %*					*08/28/09 08:27*	*SW846 8082*	*9083268*
Surr: Decachlorobiphenyl (20-150%)	*100 %*					*08/28/09 08:27*	*SW846 8082*	*9083268*
Sample ID: NSH1683-02 (OWS-2 - Oil) Sampled: 08/18/09 15:00								
Polychlorinated Biphenyls in Oil by EPA Method 8082								
PCB-1016	ND		mg/kg	0.0330	1	08/27/09 15:16	SW846 8082	9083263
PCB-1221	ND		mg/kg	0.0330	1	08/27/09 15:16	SW846 8082	9083263
PCB-1232	ND		mg/kg	0.0330	1	08/27/09 15:16	SW846 8082	9083263
PCB-1242	ND		mg/kg	0.0330	1	08/27/09 15:16	SW846 8082	9083263
PCB-1248	ND		mg/kg	0.0330	1	08/27/09 15:16	SW846 8082	9083263
PCB-1254	ND		mg/kg	0.0330	1	08/27/09 15:16	SW846 8082	9083263
PCB-1260	ND		mg/kg	0.0330	1	08/27/09 15:16	SW846 8082	9083263
Surr: Tetrachloro-meta-xylene (19-147%)	*52 %*					*08/27/09 15:16*	*SW846 8082*	*9083263*
Surr: Decachlorobiphenyl (20-150%)	*60 %*					*08/27/09 15:16*	*SW846 8082*	*9083263*
Sample ID: NSH1683-03 (OW-17 - Water) Sampled: 08/18/09 13:15								
Polychlorinated Biphenyls by EPA Method 8082								
PCB-1016	ND		ug/L	0.500	1	08/25/09 00:24	SW846 8082	9083289
PCB-1221	ND		ug/L	0.500	1	08/25/09 00:24	SW846 8082	9083289
PCB-1232	ND		ug/L	0.500	1	08/25/09 00:24	SW846 8082	9083289
PCB-1242	ND		ug/L	0.500	1	08/25/09 00:24	SW846 8082	9083289
PCB-1248	ND		ug/L	0.500	1	08/25/09 00:24	SW846 8082	9083289
PCB-1254	ND		ug/L	0.500	1	08/25/09 00:24	SW846 8082	9083289
PCB-1260	ND		ug/L	0.500	1	08/25/09 00:24	SW846 8082	9083289
Surr: Tetrachloro-meta-xylene (17-142%)	*68 %*					*08/25/09 00:24*	*SW846 8082*	*9083289*
Surr: Decachlorobiphenyl (10-149%)	*73 %*					*08/25/09 00:24*	*SW846 8082*	*9083289*
Sample ID: NSH1683-04 (OW-17 - Oil) Sampled: 08/18/09 13:00								
Polychlorinated Biphenyls in Oil by EPA Method 8082								
PCB-1016	ND		mg/kg	0.653	20	08/28/09 08:47	SW846 8082	9083263
PCB-1221	ND		mg/kg	0.653	20	08/28/09 08:47	SW846 8082	9083263
PCB-1232	ND		mg/kg	0.653	20	08/28/09 08:47	SW846 8082	9083263
PCB-1242	ND		mg/kg	0.653	20	08/28/09 08:47	SW846 8082	9083
PCB-1248	ND		mg/kg	0.653	20	08/28/09 08:47	SW846 8082	9083

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ANALYTICAL REPORT

Analyte	Result	Flag	Units	MRL	Dilution Factor	Analysis Date/Time	Method	Batch
Sample ID: NSH1683-04 (OW-17 - Oil) - cont. Sampled: 08/18/09 13:00								
Polychlorinated Biphenyls in Oil by EPA Method 8082 - cont.								
PCB-1254	ND		mg/kg	0.653	20	08/28/09 08:47	SW846 8082	9083263
PCB-1260	ND		mg/kg	0.653	20	08/28/09 08:47	SW846 8082	9083263
Surr: Tetrachloro-meta-xylene (19-147%)	*80 %*					*08/28/09 08:47*	*SW846 8082*	*9083263*
Surr: Decachlorobiphenyl (20-150%)	*160 %*	*ZX*				*08/28/09 08:47*	*SW846 8082*	*9083263*

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SAMPLE EXTRACTION DATA

Parameter	Batch	Lab Number	Wt/Vol Extracted	Extracted Vol	Date	Analyst	Extraction Method
Polychlorinated Biphenyls by EPA Method 8082							
SW846 8082	9083268	NSH1683-01	30.14	10.00	08/22/09 09:40	AJF	EPA 3550B
SW846 8082	9083268	NSH1683-01RE1	30.14	10.00	08/22/09 09:40	AJF	EPA 3550B
SW846 8082	9083289	NSH1683-03	500.00	2.00	08/21/09 09:05	MAH	EPA 3510C
Polychlorinated Biphenyls in Oil by EPA Method 8082							
SW846 8082	9083263	NSH1683-02	1.01	10.00	08/24/09 13:40	CXB	EPA 3580A
SW846 8082	9083263	NSH1683-04	1.02	10.00	08/24/09 13:40	CXB	EPA 3580A
SW846 8082	9083263	NSH1683-04RE1	1.02	10.00	08/24/09 13:40	CXB	EPA 3580A

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PROJECT QUALITY CONTROL DATA
Blank

Analyte	Blank Value	Q	Units	Q.C. Batch	Lab Number	Analyzed Date/Time
Polychlorinated Biphenyls by EPA Method 8082						
9083268-BLK1						
PCB-1016	<0.0190		mg/kg wet	9083268	9083268-BLK1	08/24/09 14:38
PCB-1221	<0.0110		mg/kg wet	9083268	9083268-BLK1	08/24/09 14:38
PCB-1232	<0.0200		mg/kg wet	9083268	9083268-BLK1	08/24/09 14:38
PCB-1242	<0.0140		mg/kg wet	9083268	9083268-BLK1	08/24/09 14:38
PCB-1248	<0.0110		mg/kg wet	9083268	9083268-BLK1	08/24/09 14:38
PCB-1254	<0.0190		mg/kg wet	9083268	9083268-BLK1	08/24/09 14:38
PCB-1260	<0.0140		mg/kg wet	9083268	9083268-BLK1	08/24/09 14:38
Surrogate: Tetrachloro-meta-xylene	66%			9083268	9083268-BLK1	08/24/09 14:38
Surrogate: Decachlorobiphenyl	84%			9083268	9083268-BLK1	08/24/09 14:38
9083289-BLK1						
PCB-1016	<0.200		ug/L	9083289	9083289-BLK1	08/24/09 22:35
PCB-1221	<0.200		ug/L	9083289	9083289-BLK1	08/24/09 22:35
PCB-1232	<0.200		ug/L	9083289	9083289-BLK1	08/24/09 22:35
PCB-1242	<0.200		ug/L	9083289	9083289-BLK1	08/24/09 22:35
PCB-1248	<0.200		ug/L	9083289	9083289-BLK1	08/24/09 22:35
PCB-1254	<0.200		ug/L	9083289	9083289-BLK1	08/24/09 22:35
PCB-1260	<0.200		ug/L	9083289	9083289-BLK1	08/24/09 22:35
Surrogate: Tetrachloro-meta-xylene	63%			9083289	9083289-BLK1	08/24/09 22:35
Surrogate: Decachlorobiphenyl	77%			9083289	9083289-BLK1	08/24/09 22:35
Polychlorinated Biphenyls in Oil by EPA Method 8082						
9083263-BLK1						
PCB-1016	<0.0190		mg/kg	9083263	9083263-BLK1	08/27/09 13:34
PCB-1221	<0.0110		mg/kg	9083263	9083263-BLK1	08/27/09 13:34
PCB-1232	<0.0200		mg/kg	9083263	9083263-BLK1	08/27/09 13:34
PCB-1242	<0.0140		mg/kg	9083263	9083263-BLK1	08/27/09 13:34
PCB-1248	<0.0110		mg/kg	9083263	9083263-BLK1	08/27/09 13:34
PCB-1254	<0.0190		mg/kg	9083263	9083263-BLK1	08/27/09 13:34
PCB-1260	<0.0140		mg/kg	9083263	9083263-BLK1	08/27/09 13:34
Surrogate: Tetrachloro-meta-xylene	90%			9083263	9083263-BLK1	08/27/09 13:34
Surrogate: Decachlorobiphenyl	88%			9083263	9083263-BLK1	08/27/09 13:34

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	Bedford, MA 01730	Project Number:	1998002.266
Attn	Christopher Mabbett	Received:	08/19/09 08:10

PROJECT QUALITY CONTROL DATA
Duplicate

Analyte	Orig. Val.	Duplicate	Q	Units	RPD	Limit	Batch	Sample Duplicated	% Rec.	Analyzed Date/Time
General Chemistry Parameters										
9090355-DUP1										
% Dry Solids	50.6	45.4		%	11	20	9090355	NSH1683-01		09/03/09 10:53

Client	Mabbett & Associates, Inc. (10615)	Work Order:	NSH1683
	5 Alfred Circle	Project Name:	Bodycote 1998002.266
	Bedford, MA 01730	Project Number:	1998002.266
Attn	Christopher Mabbett	Received:	08/19/09 08:10

PROJECT QUALITY CONTROL DATA
LCS

Analyte	Known Val.	Analyzed Val	Q	Units	% Rec.	Target Range	Batch	Analyzed Date/Time
Polychlorinated Biphenyls by EPA Method 8082								
9083268-BS1								
PCB-1260	0.167	0.154		mg/kg wet	92%	56 - 150	9083268	08/24/09 15:00
Surrogate: Tetrachloro-meta-xylene	0.0167	0.0130			78%	19 - 147	9083268	08/24/09 15:00
Surrogate: Decachlorobiphenyl	0.0167	0.0147			88%	20 - 150	9083268	08/24/09 15:00
9083289-BS1								
PCB-1260	10.0	7.54	MNR1	ug/L	75%	36 - 138	9083289	08/24/09 22:57
Surrogate: Tetrachloro-meta-xylene	1.00	0.624			62%	17 - 142	9083289	08/24/09 22:57
Surrogate: Decachlorobiphenyl	1.00	0.732			73%	10 - 149	9083289	08/24/09 22:57
Polychlorinated Biphenyls in Oil by EPA Method 8082								
9083263-BS1								
PCB-1260	5.00	5.02		mg/kg	100%	56 - 150	9083263	08/27/09 13:54
Surrogate: Tetrachloro-meta-xylene	0.500	0.490			98%	19 - 147	9083263	08/27/09 13:54
Surrogate: Decachlorobiphenyl	0.500	0.500			100%	20 - 150	9083263	08/27/09 13:54

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PROJECT QUALITY CONTROL DATA

LCS Dup

Analyte	Orig. Val.	Duplicate	Q	Units	Spike Conc	% Rec.	Target Range	RPD	Limit	Batch	Sample Duplicated	Analyzed Date/Time
Polychlorinated Biphenyls by EPA Method 8082												
9083268-BSD1												
PCB-1260		0.154		mg/kg wet	0.167	92%	56 - 150	0	36	9083268		08/24/09 15:21
Surrogate: Tetrachloro-meta-xylene		0.0117		mg/kg wet	0.0167	70%	19 - 147			9083268		08/24/09 15:21
Surrogate: Decachlorobiphenyl		0.0143		mg/kg wet	0.0167	86%	20 - 150			9083268		08/24/09 15:21
9083289-BSD1												
PCB-1260		7.15		ug/L	10.0	71%	36 - 138	5	50	9083289		08/24/09 23:19
Surrogate: Tetrachloro-meta-xylene		0.592		ug/L	1.00	59%	17 - 142			9083289		08/24/09 23:19
Surrogate: Decachlorobiphenyl		0.700		ug/L	1.00	70%	10 - 149			9083289		08/24/09 23:19

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PROJECT QUALITY CONTROL DATA
Matrix Spike

Analyte	Orig. Val.	MS Val	Q	Units	Spike Conc	% Rec.	Target Range	Batch	Sample Spiked	Analyzed Date/Time
Polychlorinated Biphenyls by EPA Method 8082										
9083268-MS1										
PCB-1016	ND	ND		mg/kg dry			20 - 175	9083268	NSH1742-02	08/24/09 15:43
PCB-1221	ND	ND		mg/kg dry			17 - 175	9083268	NSH1742-02	08/24/09 15:43
PCB-1232	ND	ND		mg/kg dry			17 - 175	9083268	NSH1742-02	08/24/09 15:43
PCB-1242	ND	ND		mg/kg dry			21 - 175	9083268	NSH1742-02	08/24/09 15:43
PCB-1248	ND	ND		mg/kg dry			17 - 151	9083268	NSH1742-02	08/24/09 15:43
PCB-1254	ND	ND		mg/kg dry			32 - 160	9083268	NSH1742-02	08/24/09 15:43
PCB-1260	ND	0.148		mg/kg dry	0.179	83%	51 - 159	9083268	NSH1742-02	08/24/09 15:43
Surrogate: Tetrachloro-meta-xylene		0.0143		mg/kg dry	0.0179	80%	19 - 147	9083268	NSH1742-02	08/24/09 15:43
Surrogate: Decachlorobiphenyl		0.0143		mg/kg dry	0.0179	80%	20 - 150	9083268	NSH1742-02	08/24/09 15:43

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	Bedford, MA 01730	Project Number:	1998002.266
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PROJECT QUALITY CONTROL DATA

Matrix Spike Dup

Analyte	Orig. Val.	Duplicate	Q	Units	Spike Conc	% Rec.	Target Range	RPD	Limit	Batch	Sample Duplicated	Analyzed Date/Time
Polychlorinated Biphenyls by EPA Method 8082												
9083268-MSD1												
PCB-1016	ND	ND		mg/kg dry			20 - 175		50	9083268	NSH1742-02	08/24/09 16:05
PCB-1221	ND	ND		mg/kg dry			17 - 175		50	9083268	NSH1742-02	08/24/09 16:05
PCB-1232	ND	ND		mg/kg dry			17 - 175		50	9083268	NSH1742-02	08/24/09 16:05
PCB-1242	ND	ND		mg/kg dry			21 - 175		35	9083268	NSH1742-02	08/24/09 16:05
PCB-1248	ND	ND		mg/kg dry			17 - 151		50	9083268	NSH1742-02	08/24/09 16:05
PCB-1254	ND	ND		mg/kg dry			32 - 160		37	9083268	NSH1742-02	08/24/09 16:05
PCB-1260	ND	0.153		mg/kg dry	0.182	84%	51 - 159	3	36	9083268	NSH1742-02	08/24/09 16:05
Surrogate: Tetrachloro-meta-xylene		0.0131		mg/kg dry	0.0182	72%	19 - 147			9083268	NSH1742-02	08/24/09 16:05
Surrogate: Decachlorobiphenyl		0.0157		mg/kg dry	0.0182	86%	20 - 150			9083268	NSH1742-02	08/24/09 16:05

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CERTIFICATION SUMMARY

TestAmerica Nashville

Method	Matrix	AIHA	Nelac	Illinois
SW846 8082	Oil	N/A	X	X
SW846 8082	Soil	N/A	X	X
SW846 8082	Water	N/A	X	X
SW-846	Soil			

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NELAC CERTIFICATION SUMMARY

TestAmerica Analytical - Nashville does not hold NELAC certifications for the following analytes included in this report

Method	Matrix	Analyte
SW-846	Soil	% Dry Solids

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DATA QUALIFIERS AND DEFINITIONS

MNR1	There was no MS/MSD analyzed with this batch due to insufficient sample volume. See Blank Spike.
RL1	Reporting limit raised due to sample matrix effects.
ZX	Due to sample matrix effects, the surrogate recovery was outside the acceptance limits.
ND	Not detected at the reporting limit (or method detection limit if shown)

METHOD MODIFICATION NOTES

TestAmerica
THE LEADER IN ENVIRONMENTAL TESTING

Nashville, TN

COOLER RECE

NSH1683

Cooler Received/Opened On 8/19/2009 @ 0810

1. Tracking # 5008 (last 4 digits, FedEx)

Courier: FedEx IR Gun ID 97460373

2. Temperature of rep. sample or temp blank when opened: 6.9 *Degrees Celsius*

3. If Item #2 temperature is 0°C or less, was the representative sample or temp blank frozen? YES NO...NA

4. Were custody seals on outside of cooler? YES...NO...NA

If yes, how many and where: 2 (Front)

5. Were the seals intact, signed, and dated correctly? YES...NO...NA

6. Were custody papers inside cooler? YES...NO...NA

I certify that I opened the cooler and answered questions 1-6 (intial) _____

7. Were custody seals on containers: YES NO and Intact YES...NO...NA

Were these signed and dated correctly? YES...NO...NA

8. Packing mat'l used? Bubblewrap Plastic bag Peanuts Vermiculite Foam Insert Paper Other None

9. Cooling process: Ice Ice-pack Ice (direct contact) Dry ice Other None

10. Did all containers arrive in good condition (unbroken)? YES...NO...NA

11. Were all container labels complete (#, date, signed, pres., etc)? YES...NO...NA

12. Did all container labels and tags agree with custody papers? YES...NO...NA

13a. Were VOA vials received? YES...NO...NA

b. Was there any observable headspace present in any VOA vial? YES...NO...NA

14. Was there a Trip Blank in this cooler? YES...NO...NA If multiple coolers, sequence #_____

I certify that I unloaded the cooler and answered questions 7-14 (intial) _____

15a. On pres'd bottles, did pH test strips suggest preservation reached the correct pH level? YES..NO..NA

b. Did the bottle labels indicate that the correct preservatives were used YES...NO...NA

16. Was residual chlorine present? YES...NO...NA 8/19/09

I certify that I checked for chlorine and pH as per SOP and answered questions 15-16 (intial) _____

17. Were custody papers properly filled out (ink, signed, etc)? YES...NO...NA

18. Did you sign the custody papers in the appropriate place? YES...NO...NA

19. Were correct containers used for the analysis requested? YES...NO...NA

20. Was sufficient amount of sample sent in each container? YES...NO...NA

I certify that I entered this project into LIMS and answered questions 17-20 (intial) _____

I certify that I attached a label with the unique LIMS number to each container (intial) _____

21. Were there Non-Conformance issues at login? YES...NO Was a PIPE generated? YES...NO...# ~~5440~~ 8/19/09

54305

BIS = Broken in shipment
Cooler Receipt Form.doc

LF-1
End of Form

Revised 6/24/09

TestAmerica

THE LEADER IN ENVIRONMENTAL TESTING

Nashville Division
2960 Foster Creighton Drive * Nashville TN 37204
Phone: (800) 765-0980 / (615) 726-0177 Fax:(615) 726-3404

Client: Mabbett & Associates, Inc. (10615)
Address: 5 Alfred Circle
City, State, Zip: Bedford MA 01730
Client Invoice Contact: Attn: Accounts Payable
Client Project Mgr: Christopher Mabbett
Client Telephone#: (781) 275-6050 Fax: (781) 275-5651
Sampler Name (Print): Christopher Mabbett
SamplerSignature: [signature]

TA Account #: 1408030 PO #: 4507
Invoice to: Mabbett & Associates, Inc. (10615)
Report to: Christopher Mabbett
Project Name: Bodycote 1998002.266
Facility ID: 1998002.266
Site Address: 1975 N Ruby St
City,State,Zip: Melrose Park Illinois
Regulatory District (CA):

NSH1683
09/02/09 23 59

	Sample ID	Date Sampled	Time Sampled	# Containers Shipped	Grab	Composite	Field Filtered	Preservative: Methanol	Sodium Bisulfate	(Blue Label) HCL	(Orange Label) NaOH	(Yellow Label) Plastic H2SO4	(Yellow Label) Glass H2SO4	(Red Label) HNO3	(Black Label) None	Matrix: Groundwater	Wastewater	Drinking Water	Sludge	Soil	Oil	(specify) Other	Analyze for: 8082 PCBs	8082 PCBs in Oil	8270C SIM Polyaromatic Hydrocarb	Cyanide Dissociable SM4500-CN	Cyanide Total 9012B	RUSH TAT (Pre Schedule) *
01	OWS-1	8/18/09	1530	1	X		N								X				X				X					
02	OWS-2	8/18/09	1500	1	X		N								X							X	X	X				
03	OW-17	8/18/09	1315	2	X		N								X		X						X					
04	OW-17	8/18/09	1300	1	X		N								X							X	X					

COMMENTS: All turn around times are calculated from the time of receipt at TestAmerica.
* Pre-Arrangements must be made AT LEAST 48 Hours in ADVANCE to receive results with RUSH turn around time commitments;additional charges may be assessed.
There may be a charge assessed for TestAmerica disposing of sample remainders.

NOTES/SPECIAL INSTRUCTIONS: BO # 15874
Lowest detection limit possible.

Relinquished by:	Date:	Time:	Received by:	Date:	Time:	Relinquished by:	Date:	Time:
[signature]	8/18/09	1600						

Shipped Via:	Received for TestAmerica by:	Date:	Time:	Shipped Via:	Temperature Upon Receipt:	Sample Containers Intact? Y N	VOCs Free of Headspace? Y N	QC Deliverables (Please Circle One): Level 2 Level 3 Level 4 Site Specific (If site specific, please pre-schedule w/ TestAmerica Project Manager or attach specific instructions)	Date Due of Report:
FedEx 4118 6136 5005	[signature]	8/19	8:10						